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8 Attorneys for Petitioner and Plaintiff  
ADRIAN RISKIN

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

1 I, Adrian Riskin, declare as follows:

2 1. I am the Petitioner in the above-captioned action. I am over the age of eighteen and  
3 have personal knowledge of the facts set forth in this declaration. If called I could and would testify  
4 competently to the matters stated herein.

5 2. As reflected in the Petition for Writ of Mandate in this matter, I submitted four  
6 California Public Records Act requests which are at issue in this litigation.

7 3. On November 10, 2018, I submitted the “Huizar Request” for emails from January 1,  
8 2015 through July 31, 2018, between Mayra Alvarez and seven other city employees, including  
9 Huizar. I submitted the request to the City’s Information Technology Agency. I had various  
10 correspondence with the City regarding the request, including regarding the number of records it  
11 would produce in response, as reflected in the Petition at paragraphs 11 through 25. The City  
12 declined to produce records under claim that it would be overburdensome to do so. *A true and*  
13 *accurate copy of the request and related correspondence was attached to the Petition as Exhibit A*  
14 *and is attached to this Declaration as Exhibit A.*

15 4. On February 16, 2019, I submitted the “Forms Request” for all filled ITA, FOIA,  
16 and/or eDiscovery Request Forms received by the City since January 1, 2016. After some  
17 correspondence, reflected in the Petition at paragraphs 27 through 33, the City declined to provide  
18 records in response to my request. *A true and accurate copy of the request and related*  
19 *correspondence was attached to the Petition as Exhibit B and is attached to this Declaration as*  
20 *Exhibit B.*

21 5. On February 19, 2016, I submitted the “Garcetti Request” for emails between  
22 various identified City employees and any email address ending in “hollywoodbid.org” from  
23 January 1, 2017 through December 31, 2019. I exchanged correspondence with the City regarding  
24 the request, as reflected in the Petition at paragraphs 40 through 66. Eventually, the City stopped  
25 responding to my communications without providing the requested records. *A true and accurate*  
26 *copy of the request and related correspondence was attached to the Petition as Exhibit C and is*  
27 *attached to this Declaration as Exhibit C.*

1       6.     On August 3, 2018, I submitted the “Williams-Westall Request” for emails from  
2 January 12, 2012 through December 31, 2014 between City employees Andrew Westall and Deron  
3 Williams. After some correspondence, as reflected in the Petition at paragraphs 73 – 83, the City  
4 replied that the records were awaiting review in the City Attorney’s office, but the City never  
5 produced the records. *A true and accurate copy of the request and related correspondence was*  
6 *attached to the Petition as Exhibit D and is attached to this Declaration as Exhibit D.*

7       7.     In response to this litigation, the City produced records in response to all four of my  
8 requests.

9       8.     The City’s response to my requests for email records – the Huizar Request, the  
10 Garcetti Request, and the Williams-Westall Request – took the form of large PDFs collecting  
11 numerous emails and attachments together into single documents. The PDFs do not contain  
12 embedded text and accordingly are not text searchable. The PDFs do not contain email metadata.  
13 The emails in the PDFs are collected in no discernable order – they are not ordered chronologically,  
14 nor by sender, nor are they collected into “threads” of emails and replies. There is no automatic way  
15 to determine how many emails are included in each PDF. The attachments to the emails are also  
16 converted to PDF format, including spreadsheets and image files. Attachments in the winmail.dat  
17 format do not convert to PDF and are not included in the PDF.

18       9.     I am very experienced in submitting public records requests for email records. In the  
19 past six years I have submitted such requests to various departments within the City, along to  
20 various local Business Improvement Districts and other state and local agencies. I have obtained,  
21 reviewed, analyzed, and published thousands of emails obtained from public records act requests,  
22 including emails in PDF format, MBOX format, and EML format. I have spent hundreds of hours  
23 working with emails in these file formats and I am personally knowledgeable as to the practical and  
24 technical differences that arise from working with emails produced in these formats.

25       10.    The City’s process of producing email records in PDF format destroys the embedded  
26 text contained within the record. As a result, the City’s PDFs are not text searchable. This causes  
27 several problems. Individual emails cannot be located via keyword search, by date, or by sender or  
28 recipient, which makes locating individual emails extremely difficult. The lack of searchability

1 makes it onerous to conduct analysis of the records, for example, by examining just those emails  
2 that contain a certain term of interest, those sent between certain individuals, or those sent during a  
3 certain time period. Further, the lack of text searchability means any emails published online may  
4 not accurately or reliably appear in search engine results, which means that members of the public  
5 interested in emails I publish may have a difficult time locating the emails via an internet search.

6 11. The City's process of producing email records in PDF format destroys the metadata  
7 contained in the record. Each email record normally contains metadata which details information  
8 such as the sender and all recipients (including, importantly, bcc recipients), and the date and time  
9 of sending. An email's metadata is as much a part of an email as other content but, when the City  
10 produces in PDF, that information is destroyed. Without metadata, an email is incomplete.

11 12. Information contained in metadata sometimes appears in the headers of emails  
12 printed in PDF format, but not always. For example: "bcc" senders and recipients can be omitted  
13 from email headers in PDF printouts of emails; PDF printouts often contain the *names* of recipients  
14 in place of their email address; where there are multiple email recipients the list of recipients is  
15 often truncated in PDF printouts, and, at times, an email (particularly when it is lower in a thread of  
16 emails) will not contain any header information at all.

17 13. As with the lack of embedded text, the lack of metadata makes it more difficult to  
18 locate individual emails, to conduct analysis of email production, and to effectively publish the  
19 emails.

20 14. Whereas one can automatically separate an MBOX file into individual EML files,  
21 there is no way to automatically separate the City's PDFs back into individual emails. If I wish to  
22 restore emails to individual files for publication from the City's PDFs, I need to do so manually,  
23 which is a very time-intensive process.

24 15. The City's process of producing email records in PDF format not only converts the  
25 emails to PDF, but also converts the attachments to the emails into PDF format. This causes  
26 problems with access to those attachments. For example, when Excel spreadsheets are converted to  
27 PDF, information contained in the spreadsheet which does not appear displayed in the cells (such as  
28 formulas used to calculate values) is destroyed. The PDFs the City creates from Excel spreadsheets

1 attached to emails are, effectively, just pictures of those spreadsheets. Additionally, when the Excel  
2 spreadsheet has more columns than fit on a single sheet of paper, the spreadsheet is broken up over  
3 several sheets and information appears without reference to column or row headings, making it  
4 impossible to understand the data without reference to the broader spreadsheet. An example of an  
5 excel spreadsheet that illustrates the problem is contained in the PDF file named  
6 “Hollywood\_2\_Redacted (final)” which the City produced in response to the Garcetti Request. The  
7 attached pages originally appeared on pages 1280 to 1294 of that PDF. *A true and accurate copy of*  
8 *that spreadsheet is attached as Exhibit E.*

9 16. Another example is when image files, such as JPG files, are converted to PDF by the  
10 City. The result is that the image files become distorted or degraded, particularly when small images  
11 are expanded to full page size. Were these images produced in their native format, I would be able  
12 to accurately view, duplicate, and publish the images, but I am unable to do so with the versions  
13 converted into PDF. An example of an image file that illustrates the problem is contained in the  
14 PDF file named “Huizar 1-3000\_Redacted (final)” which the City produced in response to the  
15 Huizar Request. The attached image originally appeared on page 891 of that PDF. *A true and*  
16 *accurate copy of that image is attached as Exhibit F.*

17 17. The problems identified above would be remedied by production in MBOX format.  
18 Emails produced in MBOX format retain embedded text and individual emails can be located by  
19 keyword search and, if published online, can be reliably and accurately located by search engines.  
20 MBOX format records retain all metadata. Records provided in MBOX format can be easily viewed  
21 as individual files and the relationship between emails and their replies are preserved. Finally,  
22 MBOX format preserves attachments in their native formats. Simply put, MBOX production is akin  
23 to receiving emails in the format that email users are accustomed to when dealing with their own  
24 email clients, such as GMAIL or Outlook: emails can be located by recipient or date or keyword,  
25 individual emails can be opened and all senders/recipients can be identified, and any attachments  
26 can be opened and worked with as needed.

27  
28

18. I intend to submit public records act requests to the City of Los Angeles for emails in the future and I anticipate the issue of format of production to continue to be an area of dispute without relief from this Court.

I declare under perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 13, 2020 at Los Angeles, CA



Adrian Riskin

Adrian Riskin

## **EXHIBIT A**

**Subject:** Re: Another foia request

**From:** ITACPRACoordinator

**Date:** 11/27/18, 10:27 AM

**To:** Michael Kohlhaas

Hello Mr. Kohlhaas,

Thank you for emailing your eDiscovery request under California Public Records Act (CPRA) to Information Technology Agency (ITA).

Please be advised that ITA has received your request on November 10th, 2018, Re: 'Email searches from January 1, 2015, through July 31, 2018, between [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) on one side and on the other side any of these addresses:

1. [councilmember.huizar@lacity.org](mailto:councilmember.huizar@lacity.org)
2. [josehuizar@josehuizar.com](mailto:josehuizar@josehuizar.com)
3. [jose.huizar@lacity.org](mailto:jose.huizar@lacity.org)
4. [paul.habib@lacity.org](mailto:paul.habib@lacity.org)
5. [rick.coca@lacity.org](mailto:rick.coca@lacity.org)
6. [martin.schlageter@lacity.org](mailto:martin.schlageter@lacity.org)
7. [francine.godoy@lacity.org](mailto:francine.godoy@lacity.org)

ITA has made its determination on your request as required by Government Code section 6253(c). To the extent that this office has non-exempt records responsive to this request, those records will be produced at the conclusion of our search. While most of the records are expected to be non-exempt, we do know that some of the records may be exempt from production. Some records may be exempt from production under California Government Code section 6254(k) because they are confidential attorney-client communications and/or protected attorney work product.

Additionally, some of the records may be exempt from release under Government Code section 6254(b) because they are "records pertaining to pending litigation." Finally, while unlikely, some requested records may be withheld under Government Code section 6255 because they would show the listed officials' deliberative process. As to these documents, Government Code section 6255 permits nondisclosure because the public interest served by protecting the official's decision-making process clearly outweighs the public interest served by the records' disclosure. Because the responsive emails must be extracted from an archival database, Government Code 6253.9(b) states that the requester shall bear the actual cost of producing a copy of the record, including the cost to construct a record, and the cost of programming and computer services necessary to extract a copy of the record whenever programming is required. We will email you in the coming weeks with the estimated labor cost once our IT staff is able to program your search. Please keep in mind that the California Public Records Act allows this department to receive payment in advance of the delivery of the records. As you know, we are processing CPRA searches in the order they are received and there are requests ahead of yours to be completed.

At this time, we estimate that we will be able to produce the records to you by the end of February 2019 or around then.

Please feel free to contact me directly, should you have any questions or concerns.

Thank You for your cooperation

With Regards

On Wed, Nov 14, 2018 at 10:23 AM ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

Hello '[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)'

Thank you for your FOIA email requesting ITA to see all emails from January 1, 2015, through July 31, 2018, between [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) and the list of email addresses you have mentioned in your email.

ITA has received your FOIA request and working on the determination calculations.

ITA will inform you in details of the delivery.

Thank You

On Sat, Nov 10, 2018 at 7:41 PM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)> wrote:

Mr Arora thank you for all your help so far. I am going to need to see all emails from January 1, 2015 through July 31, 2018 between [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) on one side and on the other side any of these addresses:

1. [councilmember.huizar@lacity.org](mailto:councilmember.huizar@lacity.org)
2. [josehuizar@josehuizar.com](mailto:josehuizar@josehuizar.com)
3. [jose.huizar@lacity.org](mailto:jose.huizar@lacity.org)
4. [paul.habib@lacity.org](mailto:paul.habib@lacity.org)
5. [rick.coca@lacity.org](mailto:rick.coca@lacity.org)
6. [martin.schlageter@lacity.org](mailto:martin.schlageter@lacity.org)
7. [francine.godoy@lacity.org](mailto:francine.godoy@lacity.org)

**Subject:** Re: Another foia request

**From:** ITACPRACoordinator

**Date:** 2/11/19, 9:58 AM

**To:** Michael Kohlhaas

Hello Mr. Kohlhaas,

FYI - ITA has completed your CPRA request and is now under review process with counsel. Thank you

On Tue, Nov 27, 2018 at 10:27 AM ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

Hello Mr. Kohlhaas,

Thank you for emailing your eDiscovery request under California Public Records Act (CPRA) to Information Technology Agency (ITA).

Please be advised that ITA has received your request on November 10th, 2018, Re: 'Email searches from January 1, 2015, through July 31, 2018, between [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) on one side and on the other side any of these addresses:

1. [councilmember.huizar@lacity.org](mailto:councilmember.huizar@lacity.org)
2. [josehuizar@josehuizar.com](mailto:josehuizar@josehuizar.com)
3. [jose.huizar@lacity.org](mailto:jose.huizar@lacity.org)
4. [paul.habib@lacity.org](mailto:paul.habib@lacity.org)
5. [rick.coca@lacity.org](mailto:rick.coca@lacity.org)
6. [martin.schlageter@lacity.org](mailto:martin.schlageter@lacity.org)
7. [francine.godoy@lacity.org](mailto:francine.godoy@lacity.org)

ITA has made its determination on your request as required by Government Code section 6253(c). To the extent that this office has non-exempt records responsive to this request, those records will be produced at the conclusion of our search. While most of the records are expected to be non-exempt, we do know that some of the records may be exempt from production. Some records may be exempt from production under California Government Code section 6254(k) because they are confidential attorney-client communications and/or protected attorney work product.

Additionally, some of the records may be exempt from release under Government Code section 6254(b) because they are "records pertaining to pending litigation." Finally, while unlikely, some requested records may be withheld under Government Code section 6255 because they would show the listed officials' deliberative process. As to these documents, Government Code section 6255 permits nondisclosure because the public interest served by protecting the official's decision-making process clearly outweighs the public interest served by the records' disclosure. Because the responsive emails must be extracted from an archival database, Government Code 6253.9(b) states that the requester shall bear the actual cost of producing a copy of the record, including the cost to construct a record, and the cost of programming and computer services necessary to extract a copy of the record whenever programming is required. We will email you in the coming weeks with the estimated labor cost once our IT staff is able to program your search. Please keep in mind that the California Public Records Act allows this department to receive payment in advance of the delivery of the records. As you know, we are processing CPRA searches in the order they are received and there are requests ahead of yours to be completed.

At this time, we estimate that we will be able to produce the records to you by the end of February 2019 or around then.

Please feel free to contact me directly, should you have any questions or concerns.

Thank You for your cooperation

With Regards

On Wed, Nov 14, 2018 at 10:23 AM ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

Hello '[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)'

Thank you for your FOIA email requesting ITA to see all emails from January 1, 2015, through July 31, 2018, between [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) and the list of email addresses you have mentioned in your email.

ITA has received your FOIA request and working on the determination calculations.

ITA will inform you in details of the delivery.

Thank You

On Sat, Nov 10, 2018 at 7:41 PM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)> wrote:

Mr Arora thank you for all your help so far. I am going to need to see all emails from January 1, 2015 through July 31, 2018 between [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) on one side and on the other side any of these addresses:

1. [councilmember.huizar@lacity.org](mailto:councilmember.huizar@lacity.org)
2. [josehuizar@josehuizar.com](mailto:josehuizar@josehuizar.com)
3. [jose.huizar@lacity.org](mailto:jose.huizar@lacity.org)

**Subject:** Re: Another foia request

**From:** ITACPRACoordinator

**Date:** 2/14/19, 3:18 PM

**To:** BBFLA

**CC:** Kuljeet Arora <Kuljeet.Arora@lacity.org>, Jeanne Holm <jeanne.holm@lacity.org>

Mr. Kohlhass,

This is in further response to your California Public Records Act (CPRA) request of November 10th, 2018, seeking emails between [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) and a number of other [lacity.org](http://lacity.org) email addresses.

Your request generated over twelve thousand responsive records. That is greatly in excess of our ability to process. Processing your request would require carefully reviewing each of the emails for any of several exemptions under the CPRA, redacting any exempt portions of the emails, and then copying the redacted copies before producing them to you. The public interest in processing these responsive records is clearly outweighed by the vast amount of staff time that would have to be dedicated to performing the task. Your request is therefore exempt from production under Government Code section 6255.

If you want to make a new CPRA request, we recommend that you significantly limit both the time period and also provide a few search terms (ones that are unusual enough that they will not generate a very large number of hits) that will result in a volume of records that City staff can review while not unreasonably interfering with their other important duties.

Thank you for your consideration.

On Sat, Nov 10, 2018 at 7:41 PM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)> wrote:

Mr Arora thank you for all your help so far. I am going to need to see all emails from January 1, 2015 through July 31, 2018 between [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) on one side and on the other side any of these addresses:

1. [councilmember.huizar@lacity.org](mailto:councilmember.huizar@lacity.org)
2. [josehuizar@josehuizar.com](mailto:josehuizar@josehuizar.com)
3. [jose.huizar@lacity.org](mailto:jose.huizar@lacity.org)
4. [paul.habib@lacity.org](mailto:paul.habib@lacity.org)
5. [rick.coca@lacity.org](mailto:rick.coca@lacity.org)
6. [martin.schlageter@lacity.org](mailto:martin.schlageter@lacity.org)
7. [francine.godoy@lacity.org](mailto:francine.godoy@lacity.org)

Thank you Mr. Arora.

**Subject:** Re: Another foia request

**From:** BBFLA

**Date:** 2/14/19, 6:09 PM

**To:** ITACPRACoordinator

**CC:** Kuljeet Arora <Kuljeet.Arora@lacity.org>, Jeanne Holm <jeanne.holm@lacity.org>

Good day, Mr. Arora.

Rather than me making a new request, perhaps the City of Los Angeles will merely process the first 11,121 of these emails. I know for certain that that number is within the City's ability to process as the City returned precisely that many emails in two MBOX files in response to request 18-1993, made by an associate of mine.

Also, given that the City of Los Angeles has in the past processed 11,121 emails in response to a request substantially identical to this one, a 6255(a) claim will be difficult to defend given that the public interest in seeing these emails is substantially higher than the public interest in seeing the 11,121 emails responsive to request 18-1993, which, as I said, were happily and promptly processed by the City of Los Angeles. Just for instance, the subjects of this request have been reported on regularly in local and national newspapers pretty much since October 2018, and this is not to mention both television and radio coverage.

Given that heightened public interest and given that 12,000 isn't much bigger than 11,121, I think it's fair to ask the City of Los Angeles to withdraw the 6255(a) claim. However, in the spirit of cooperation I am willing to limit my request to the chronologically latest 11,121 emails in the MBOX file. As I'm sure you're aware, an MBOX is a text file with only very light formatting. It's an easy enough task to split off the last 11,121 emails and process those.

If the City of Los Angeles isn't willing to accept this compromise, I hope you will respond by telling me the maximum number of emails the City of Los Angeles is willing to process from this request and how that number was chosen in relation to the known bound of 11,121 emails to process.

Thanks so much for your help!

On 2/14/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

```
> Mr. Kohlhass,  
>  
> This is in further response to your California Public Records Act (CPRA)  
> request of November 10th, 2018, seeking emails between  
> mayra.alvarez@lacity.org and a number of other lacity.org email addresses.  
>  
> Your request generated over twelve thousand responsive records. That is  
> greatly in excess of our ability to process. Processing your request would  
> require carefully reviewing each of the emails for any of several  
> exemptions under the CPRA, redacting any exempt portions of the emails, and  
> then copying the redacted copies before producing them to you. The public  
> interest in processing these responsive records is clearly outweighed by  
> the vast amount of staff time that would have to be dedicated to performing  
> the task. Your request is therefore exempt from production under Government  
> Code section 6255.  
>  
> If you want to make a new CPRA request, we recommend that you significantly  
> limit both the time period and also provide a few search terms (ones that  
> are unusual enough that they will not generate a very large number of hits)  
> that will result in a volume of records that City staff can review while  
> not unreasonably interfering with their other important duties.  
>  
> Thank you for your consideration.  
>  
>  
> On Sat, Nov 10, 2018 at 7:41 PM BBFLA <beatboxingfoollosangeles@gmail.com>  
> wrote:  
>  
>> Mr Arora thank you for all your help so far. I am going to need to see  
>> all emails from January 1, 2015 through July 31, 2018 between  
>> mayra.alvarez@lacity.org on one side and on the other side any of these  
>> addresses:  
>>  
>> 1. councilmember.huizar@lacity.org  
>> 2. josehuizar@josehuizar.com  
>> 3. jose.huizar@lacity.org  
>> 4. paul.habib@lacity.org  
>> 5. rick.coca@lacity.org  
>> 6. martin.schlageter@lacity.org  
>> 7. francine.godoy@lacity.org  
>>  
>> Thank you Mr. Arora.  
>>  
>>
```

**Subject:** Re: Another foia request  
**From:** ITACPRACoordinator  
**Date:** 2/15/19, 8:58 AM  
**To:** BBFLA  
**CC:** Jeanne Holm <jeanne.holm@lacity.org>

Hello Mr. Kohlhass,

No, 12,000 of the requested production is beyond our current abilities to process and clearly not in the public interest to devote the required staff-time to do so. Please submit a new request if you wish. It is not possible to state the maximum number of emails we can process. It depends on the nature of the production and how time-consuming it will be to review the documents for exemptions and redact them as appropriate.

Thank you

Regards

On Thu, Feb 14, 2019 at 6:09 PM BBFLA <[beatboxingfoollosoangeles@gmail.com](mailto:beatboxingfoollosoangeles@gmail.com)> wrote:  
Good day, Mr. Arora.

Rather than me making a new request, perhaps the City of Los Angeles will merely process the first 11,121 of these emails. I know for certain that that number is within the City's ability to process as the City returned precisely that many emails in two MBOX files in response to request 18-1993, made by an associate of mine.

Also, given that the City of Los Angeles has in the past processed 11,121 emails in response to a request substantially identical to this one, a 6255(a) claim will be difficult to defend given that the public interest in seeing these emails is substantially higher than the public interest in seeing the 11,121 emails responsive to request 18-1993, which, as I said, were happily and promptly processed by the City of Los Angeles. Just for instance, the subjects of this request have been reported on regularly in local and national newspapers pretty much since October 2018, and this is not to mention both television and radio coverage.

Given that heightened public interest and given that 12,000 isn't much bigger than 11,121, I think it's fair to ask the City of Los Angeles to withdraw the 6255(a) claim. However, in the spirit of cooperation I am willing to limit my request to the chronologically latest 11,121 emails in the MBOX file. As I'm sure you're aware, an MBOX is a text file with only very light formatting. It's an easy enough task to split off the last 11,121 emails and process those.

If the City of Los Angeles isn't willing to accept this compromise, I hope you will respond by telling me the maximum number of emails the City of Los Angeles is willing to process from this request and how that number was chosen in relation to the known bound of 11,121 emails to process.

Thanks so much for your help!

On 2/14/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

> Mr. Kohlhass,  
>  
> This is in further response to your California Public Records Act (CPRA)  
> request of November 10th, 2018, seeking emails between  
> [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) and a number of other [lacity.org](http://lacity.org) email addresses.  
>  
> Your request generated over twelve thousand responsive records. That is  
> greatly in excess of our ability to process. Processing your request would  
> require carefully reviewing each of the emails for any of several  
> exemptions under the CPRA, redacting any exempt portions of the emails, and  
> then copying the redacted copies before producing them to you. The public  
> interest in processing these responsive records is clearly outweighed by  
> the vast amount of staff time that would have to be dedicated to performing  
> the task. Your request is therefore exempt from production under Government  
> Code section 6255.  
>

**Subject:** Re: Another foia request

**From:** BBFLA

**Date:** 2/15/19, 9:39 AM

**To:** ITACPRACoordinator

**CC:** Jeanne Holm <jeanne.holm@lacity.org>

Good day Mr. ITACPRACoordinator,

It's not reasonable to ask me to make another request when this one took months to fulfill. Please help me to make this more amenable to ITA's actually doing it per duty imposed by CPRA at section 6253.1(a)(3), which requires City to "Provide suggestions for overcoming any practical basis for denying access to the records or information sought." Practical basis is evidently that there are too many. Suggestion would be to say how many. You say that it is not possible to state a max number b/c it's fact dependent. You have the facts before you. Please state the number you would process for **\*this\*** request as a suggestion for a overcoming City's putative practical basis.

We know it's less than 11,121. How about 10,000?

Also, if it's so **\*clearly\*** in public interest not to do this work even though the whole world wants to know what's in these emails, can you potentially explain what's so clear about it? Esp in reference to those 11,121 emails of Ms. Wolcott which are pretty but not that interesting?

On 2/15/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

> Hello Mr. Kohlhass,  
>  
> No, 12,000 of the requested production is beyond our current abilities to  
> process and clearly not in the public interest to devote the required  
> staff-time to do so. Please submit a new request if you wish. It is not  
> possible to state the maximum number of emails we can process. It depends  
> on the nature of the production and how time-consuming it will be to review  
> the documents for exemptions and redact them as appropriate.  
>  
> Thank you  
>  
> Regards  
>  
>  
> On Thu, Feb 14, 2019 at 6:09 PM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)>  
> wrote:  
>  
>> Good day, Mr. Arora.  
>>  
>> Rather than me making a new request, perhaps the City of Los Angeles  
>> will merely process the first 11,121 of these emails. I know for  
>> certain that that number is within the City's ability to process as  
>> the City returned precisely that many emails in two MBOX files in  
>> response to request 18-1993, made by an associate of mine.  
>>  
>> Also, given that the City of Los Angeles has in the past processed  
>> 11,121 emails in response to a request substantially identical to this  
>> one, a 6255(a) claim will be difficult to defend given that the public  
>> interest in seeing these emails is substantially higher than the  
>> public interest in seeing the 11,121 emails responsive to request  
>> 18-1993, which, as I said, were happily and promptly processed by the  
>> City of Los Angeles. Just for instance, the subjects of this request  
>> have been reported on regularly in local and national newspapers  
>> pretty much since October 2018, and this is not to mention both  
>> television and radio coverage.  
>>  
>> Given that heightened public interest and given that 12,000 isn't much  
>> bigger than 11,121, I think it's fair to ask the City of Los Angeles  
>> to withdraw the 6255(a) claim. However, in the spirit of cooperation  
>> I am willing to limit my request to the chronologically latest 11,121  
>> emails in the MBOX file. As I'm sure you're aware, an MBOX is a text  
>> file with only very light formatting. It's an easy enough task to  
>> split off the last 11,121 emails and process those.  
>>  
>> If the City of Los Angeles isn't willing to accept this compromise, I  
>> hope you will respond by telling me the maximum number of emails the  
>> City of Los Angeles is willing to process from this request and how  
>> that number was chosen in relation to the known bound of 11,121 emails  
>> to process.  
>>  
>> Thanks so much for your help!  
>>  
>> On 2/14/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:  
>>> Mr. Kohlhass,  
>>>  
>>> This is in further response to your California Public Records Act  
>>> (CPRA)  
>>> request of November 10th, 2018, seeking emails between  
>>> [mayra.alvarez@lacity.org](mailto:mayra.alvarez@lacity.org) and a number of other lacity.org email  
>> addresses.

**Subject:** Re: Another foia request

**From:** ITACPRACoordinator

**Date:** 2/20/19, 8:16 AM

**To:** ITA CPRACoordinator <[itacpracoordinator@lacity.org](mailto:itacpracoordinator@lacity.org)>, Michael Kohlhaas

<[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)>

**CC:** Jeanne Holm <[jeanne.holm@lacity.org](mailto:jeanne.holm@lacity.org)>

Hello Mr. Kohlhaas,

Providing a number is not the way to focus your request. We suggest that you specify a small number of persons whose email you are looking for (e.g., "please look for correspondences between X and Y") and provide a subject matter by providing a few search terms (ones that will not generate a huge volume of hits). We would be happy to provide more fine-grained suggestions if you inform us what sorts of information you're looking for.

Thank you

Best regards

On Fri, Feb 15, 2019 at 9:39 AM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)> wrote:

Good day Mr. ITACPRACoordinator,

It's not reasonable to ask me to make another request when this one took months to fulfill. Please help me to make this more amenable to ITA's actually doing it per duty imposed by CPRA at section 6253.1(a)(3), which requires City to "Provide suggestions for overcoming any practical basis for denying access to the records or information sought." Practical basis is evidently that there are too many. Suggestion would be to say how many. You say that it is not possible to state a max number b/c it's fact dependent. You have the facts before you. Please state the number you would process for \*this\* request as a suggestion for a overcoming City's putative practical basis.

We know it's less than 11,121. How about 10,000?

Also, if it's so \*clearly\* in public interest not to do this work even though the whole world wants to know what's in these emails, can you potentially explain what's so clear about it? Esp in reference to those 11,121 emails of Ms. Wolcott which are pretty but not that interesting?

On 2/15/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

> Hello Mr. Kohlhass,

>

> No, 12,000 of the requested production is beyond our current abilities to process and clearly not in the public interest to devote the required staff-time to do so. Please submit a new request if you wish. It is not possible to state the maximum number of emails we can process. It depends on the nature of the production and how time-consuming it will be to review the documents for exemptions and redact them as appropriate.

>

> Thank you

>

> Regards

>

>

> On Thu, Feb 14, 2019 at 6:09 PM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)>

> wrote:

>

>> Good day, Mr. Arora.

>>

>> Rather than me making a new request, perhaps the City of Los Angeles will merely process the first 11,121 of these emails. I know for certain that that number is within the City's ability to process as the City returned precisely that many emails in two MBOX files in response to request 18-1993, made by an associate of mine.

>>

>> Also, given that the City of Los Angeles has in the past processed 11,121 emails in response to a request substantially identical to this one, a 6255(a) claim will be difficult to defend given that the public interest in seeing these emails is substantially higher than the public interest in seeing the 11,121 emails responsive to request 18-1993, which, as I said, were happily and promptly processed by the City of Los Angeles. Just for instance, the subjects of this request have been reported on regularly in local and national newspapers

**Subject:** Re: Another foia request

**From:** BBFLA

**Date:** 2/20/19, 9:00 AM

**To:** ITACPRACoordinator

**CC:** Jeanne Holm <jeanne.holm@lacity.org>

That would ordinarily make sense, but in this case even if I provide search terms other than the email addresses the facts of this particular case will not change, so that when you're using the facts to determine the public interest, like you said you would, those facts will determine a number that you're willing to process, like you said. Since the fact will not change, the number will not change, so that requiring me to submit a new request will have no effect whatsoever other than to significantly delay my access to these records.

To sum up:

You said that you were willing to provide 11,121 emails in another case b/c the facts were different.

The facts in this case do not justify providing 11,121 records.

You will not tell me the number that the facts will justify providing.

Instead you tell me to wait another four months, during which the facts won't change, to find out how many you will process.

Doesn't this seem silly?

Why don't you just give me however many emails the facts justify in your opinion?

On 2/20/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

```
> Hello Mr. Kohlhaas,  
> Providing a number is not the way to focus your request. We suggest that  
> you specify a small number of persons whose email you are looking for  
> (e.g., "please look for correspondences between X and Y") and provide a  
> subject matter by providing a few search terms (ones that will not generate  
> a huge volume of hits). We would be happy to provide more fine-grained  
> suggestions if you inform us what sorts of information you're looking for.  
> Thank you  
> Best regards  
>  
> On Fri, Feb 15, 2019 at 9:39 AM BBFLA <beatboxingfoollosangeles@gmail.com>  
> wrote:  
>  
    >> Good day Mr. ITACPRACoordinator,  
    >>  
    >> It's not reasonable to ask me to make another request when this one  
    >> took months to fulfill. Please help me to make this more amenable to  
    >> ITA's actually doing it per duty imposed by CPRA at section  
    >> 6253.1(a)(3), which requires City to "Provide suggestions for  
    >> overcoming any practical basis for denying access to the records or  
    >> information sought." Practical basis is evidently that there are too  
    >> many. Suggestion would be to say how many. You say that it is not  
    >> possible to state a max number b/c it's fact dependent. You have the  
    >> facts before you. Please state the number you would process for  
    >> *this* request as a suggestion for a overcoming City's putative  
    >> practical basis.  
    >>  
    >> We know it's less than 11,121. How about 10,000?  
    >>  
    >> Also, if it's so *clearly* in public interest not to do this work even  
    >> though the whole world wants to know what's in these emails, can you  
    >> potentially explain what's so clear about it? Esp in reference to  
    >> those 11,121 emails of Ms. Wolcott which are pretty but not that  
    >> interesting?  
    >>  
    >> On 2/15/19, ITACPRACoordinator <ITACPRACoordinator@lacity.org> wrote:  
        >>> Hello Mr. Kohlhass,  
        >>>  
        >>> No, 12,000 of the requested production is beyond our current abilities  
        >>> to  
        >>> process and clearly not in the public interest to devote the required  
        >>> staff-time to do so. Please submit a new request if you wish. It is not  
        >>> possible to state the maximum number of emails we can process. It  
        >>> depends  
        >>> on the nature of the production and how time-consuming it will be to  
    >> review  
        >>> the documents for exemptions and redact them as appropriate.  
        >>>  
        >>> Thank you  
        >>>  
        >>> Regards  
        >>>  
        >>>  
        >>>  
        >>> On Thu, Feb 14, 2019 at 6:09 PM BBFLA <  
    >> beatboxingfoollosangeles@gmail.com>
```

**Subject:** Re: Another foia request

**From:** ITACPRACoordinator

**Date:** 2/20/19, 9:14 AM

**To:** ITA CPRACoordinator <[itacpracoordinator@lacity.org](mailto:itacpracoordinator@lacity.org)>, Michael Kohlhaas

<[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)>

**CC:** Strefan Fauble <[strefan.fauble@lacity.org](mailto:strefan.fauble@lacity.org)>, Jeanne Holm <[jeanne.holm@lacity.org](mailto:jeanne.holm@lacity.org)>

Mr.Kohlhaas,

For your new and revised request, we will provide you the count on the new search first within 2 days, your request is still active and is in progress, so don't have to wait for additional 4 months. Please let me know if you could revise the request.

Thank You

On Wed, Feb 20, 2019 at 9:00 AM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)> wrote:

That would ordinarily make sense, but in this case even if I provide search terms other than the email addresses the facts of this particular case will not change, so that when you're using the facts to determine the public interest, like you said you would, those facts will determine a number that you're willing to process, like you said. Since the fact will not change, the number will not change, so that requiring me to submit a new request will have no effect whatsoever other than to significantly delay my access to these records.

To sum up:

You said that you were willing to provide 11,121 emails in another case b/c the facts were different.

The facts in this case do not justify providing 11,121 records.

You will not tell me the number that the facts will justify providing.

Instead you tell me to wait another four months, during which the facts won't change, to find out how many you will process.

Doesn't this seem silly?

Why don't you just give me however many emails the facts justify in your opinion?

On 2/20/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

> Hello Mr. Kohlhaas,  
> Providing a number is not the way to focus your request. We suggest that  
> you specify a small number of persons whose email you are looking for  
> (e.g., "please look for correspondences between X and Y") and provide a  
> subject matter by providing a few search terms (ones that will not generate  
> a huge volume of hits). We would be happy to provide more fine-grained  
> suggestions if you inform us what sorts of information you're looking for.  
> Thank you  
> Best regards  
>

> On Fri, Feb 15, 2019 at 9:39 AM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)>  
> wrote:

>> Good day Mr. ITACPRACoordinator,  
>>

>> It's not reasonable to ask me to make another request when this one  
>> took months to fulfill. Please help me to make this more amenable to  
>> ITA's actually doing it per duty imposed by CPRA at section  
>> 6253.1(a)(3), which requires City to "Provide suggestions for  
>> overcoming any practical basis for denying access to the records or  
>> information sought." Practical basis is evidently that there are too  
>> many. Suggestion would be to say how many. You say that it is not  
>> possible to state a max number b/c it's fact dependent. You have the  
>> facts before you. Please state the number you would process for  
>> \*this\* request as a suggestion for a overcoming City's putative  
>> practical basis.

>>  
>> We know it's less than 11,121. How about 10,000?

**Subject:** Re: Another foia request

**From:** BBFLA

**Date:** 2/20/19, 9:53 AM

**To:** ITACPRACoordinator

**CC:** Strefan Fauble <strefan.fauble@lacity.org>, Jeanne Holm <jeanne.holm@lacity.org>

I still don't understand why a revision involving search terms is required. In fact I think it must not be required, at least in this case.

As you are certainly aware as a result of your fact-based 6255(a) analysis, on the basis of which you denied my request as stated, these emails are of the utmost public interest not least because of allegations of sexual harassment made against Mr. Huizar. It's in the nature of sexual harassment that it cannot be determined by the specific words used, but only by the intent with which the words were used. Thus it is not possible to narrow the scope of this request by providing specific words to search on.

Also, all of Mr. Huizar's transactions with real estate developers are of the utmost public interest, which is evinced by the constant coverage in both local and national news. Therefore discussions among his staff about such matters are also of interest. But no one currently knows enough about the situation to choose search terms that will capture the parts of the discussion that are of interest.

These are two highly specific fact-based arguments for why it is absolutely not appropriate in this specific case to narrow this request by use of search terms.

Since the law requires you to have based your 6255(a) exemption on a judgment that saving the labor involving in reviewing 12K+ emails is more valuable to the public than learning about these matters, you must also be able to use that same analysis to determine that the balance would tip the other way if there were only X emails. Obviously you would have provided one email, so 1 <= X <= 12K. Why won't you just tell me what X is and produce that many emails? The analysis must already be done.

If you still refuse to do this, I hope that (a) you'll explain why and (b) allow me to narrow it by date, and give me the most recent emails that don't constitute too many to review.

On 2/20/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

```
> Mr.Kohlhaas,  
> For your new and revised request, we will provide you the count on the new  
> search first within 2 days, your request is still active and is in  
> progress, so don't have to wait for additional 4 months. Please let me  
> know if you could revise the request.  
>  
> Thank You  
>  
> On Wed, Feb 20, 2019 at 9:00 AM BBFLA <beatboxingfoollosangeles@gmail.com>  
> wrote:  
>  
>> That would ordinarily make sense, but in this case even if I provide  
>> search terms other than the email addresses the facts of this  
>> particular case will not change, so that when you're using the facts  
>> to determine the public interest, like you said you would, those facts  
>> will determine a number that you're willing to process, like you said.  
>> Since the fact will not change, the number will not change, so that  
>> requiring me to submit a new request will have no effect whatsoever  
>> other than to significantly delay my access to these records.  
>>  
>> To sum up:  
>>  
>> You said that you were willing to provide 11,121 emails in another  
>> case b/c the facts were different.  
>>  
>> The facts in this case do not justify providing 11,121 records.  
>>  
>> You will not tell me the number that the facts will justify providing.  
>>  
>> Instead you tell me to wait another four months, during which the  
>> facts won't change, to find out how many you will process.  
>>  
>> Doesn't this seem silly?  
>>  
>> Why don't you just give me however many emails the facts justify in  
>> your opinion?  
>>  
>> On 2/20/19, ITACPRACoordinator <ITACPRACoordinator@lacity.org> wrote:  
>>> Hello Mr. Kohlhaas,  
>>> Providing a number is not the way to focus your request. We suggest  
>>> that  
>>> you specify a small number of persons whose email you are looking for  
>>> (e.g., "please look for correspondences between X and Y") and provide a  
>>> subject matter by providing a few search terms (ones that will not
```

**Subject:** Re: Another foia request

**From:** BBFLA

**Date:** 3/1/19, 6:16 AM

**To:** ITACPRACoordinator

**CC:** "Strefan Fauble" <strefan.fauble@lacity.org>, "Jeanne Holm" <jeanne.holm@lacity.org>

Good morning Mr. Arora,

Can you please tell me whether or not you're planning to respond to this? I don't mind waiting while you consider it but I would like to know if you're going to answer at all.

On Wed, Feb 20, 2019, at 9:53 AM, BBFLA wrote:

> I still don't understand why a revision involving search terms is  
> required. In fact I think it must not be required, at least in this  
> case.  
>  
> As you are certainly aware as a result of your fact-based 6255(a)  
> analysis, on the basis of which you denied my request as stated, these  
> emails are of the utmost public interest not least because of  
> allegations of sexual harassment made against Mr. Huizar. It's in the  
> nature of sexual harassment that it cannot be determined by the  
> specific words used, but only by the intent with which the words were  
> used. Thus it is not possible to narrow the scope of this request by  
> providing specific words to search on.  
>  
> Also, all of Mr. Huizar's transactions with real estate developers are  
> of the utmost public interest, which is evinced by the constant  
> coverage in both local and national news. Therefore discussions among  
> his staff about such matters are also of interest. But no one  
> currently knows enough about the situation to choose search terms that  
> will capture the parts of the discussion that are of interest.  
>  
> These are two highly specific fact-based arguments for why it is  
> absolutely not appropriate in this specific case to narrow this  
> request by use of search terms.  
>  
> Since the law requires you to have based your 6255(a) exemption on a  
> judgment that saving the labor involving in reviewing 12K+ emails is  
> more valuable to the public than learning about these matters, you  
> must also be able to use that same analysis to determine that the  
> balance would tip the other way if there were only X emails.  
> Obviously you would have provided one email, so 1 <= X <= 12K. Why  
> won't you just tell me what X is and produce that many emails? The  
> analysis must already be done.  
>  
> If you still refuse to do this, I hope that (a) you'll explain why and  
> (b) allow me to narrow it by date, and give me the most recent emails  
> that don't constitute too many to review.  
>  
>  
>  
> On 2/20/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

> > Mr.Kohlhaas,  
> > For your new and revised request, we will provide you the count on the new  
> > search first within 2 days, your request is still active and is in  
> > progress, so don't have to wait for additional 4 months. Please let me  
> > know if you could revise the request.  
> >  
> > Thank You  
> >  
> > On Wed, Feb 20, 2019 at 9:00 AM BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)>  
> > wrote:  
> >

> >> That would ordinarily make sense, but in this case even if I provide  
> >> search terms other than the email addresses the facts of this  
> >> particular case will not change, so that when you're using the facts  
> >> to determine the public interest, like you said you would, those facts  
> >> will determine a number that you're willing to process, like you said.  
> >> Since the fact will not change, the number will not change, so that  
> >> requiring me to submit a new request will have no effect whatsoever  
> >> other than to significantly delay my access to these records.  
> >>

> >> To sum up:  
> >>  
> >> You said that you were willing to provide 11,121 emails in another  
> >> case b/c the facts were different.  
> >>

> >> The facts in this case do not justify providing 11,121 records.  
> >>

> >> You will not tell me the number that the facts will justify providing.  
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> >> Instead you tell me to wait another four months, during which the  
> >> facts won't change, to find out how many you will process.  
> >>

> >> Doesn't this seem silly?  
> >>

> >> Why don't you just give me however many emails the facts justify in  
> >> your opinion?  
> >>

> >> On 2/20/19, ITACPRACoordinator <[ITACPRACoordinator@lacity.org](mailto:ITACPRACoordinator@lacity.org)> wrote:

**Subject:** Re: Another foia request

**From:** BBFLA

**Date:** 3/6/19, 6:25 PM

**To:** ITACPRACoordinator

**CC:** Strefan Fauble <strefan.fauble@lacity.org>, Jeanne Holm <jeanne.holm@lacity.org>

Good evening, Mr. Arora.

Since you won't agree to produce how ever many emails you're willing to produce, and since you insist that I limit my request by search terms rather than by number of emails, even though as I explained I can't think of search terms, I would like to suggest this compromise.

Why don't you think of some search terms that you find acceptable given my description of what I'm looking for and taking into account your unrevealed number of emails that you're willing to produce, and produce emails that contain those terms. At this point I would rather have whatever you're willing to give me rather than let this request slide to oblivion.

On 3/1/19, BBFLA <[beatboxingfoollosangeles@gmail.com](mailto:beatboxingfoollosangeles@gmail.com)> wrote:

```
> Good morning Mr. Arora,  
>  
> Can you please tell me whether or not you're planning to respond to this? I  
> don't mind waiting while you consider it but I would like to know if you're  
> going to answer at all.  
>  
>  
> On Wed, Feb 20, 2019, at 9:53 AM, BBFLA wrote:  
  
>> I still don't understand why a revision involving search terms is  
>> required. In fact I think it must not be required, at least in this  
>> case.  
>>  
>> As you are certainly aware as a result of your fact-based 6255(a)  
>> analysis, on the basis of which you denied my request as stated, these  
>> emails are of the utmost public interest not least because of  
>> allegations of sexual harassment made against Mr. Huizar. It's in the  
>> nature of sexual harassment that it cannot be determined by the  
>> specific words used, but only by the intent with which the words were  
>> used. Thus it is not possible to narrow the scope of this request by  
>> providing specific words to search on.  
>>  
>> Also, all of Mr. Huizar's transactions with real estate developers are  
>> of the utmost public interest, which is evinced by the constant  
>> coverage in both local and national news. Therefore discussions among  
>> his staff about such matters are also of interest. But no one  
>> currently knows enough about the situation to choose search terms that  
>> will capture the parts of the discussion that are of interest.  
>>  
>> These are two highly specific fact-based arguments for why it is  
>> absolutely not appropriate in this specific case to narrow this  
>> request by use of search terms.  
>>  
>> Since the law requires you to have based your 6255(a) exemption on a  
>> judgment that saving the labor involving in reviewing 12K+ emails is  
>> more valuable to the public than learning about these matters, you  
>> must also be able to use that same analysis to determine that the  
>> balance would tip the other way if there were only X emails.  
>> Obviously you would have provided one email, so 1 <= X <= 12K. Why  
>> won't you just tell me what X is and produce that many emails? The  
>> analysis must already be done.  
>>  
>> If you still refuse to do this, I hope that (a) you'll explain why and  
>> (b) allow me to narrow it by date, and give me the most recent emails  
>> that don't constitute too many to review.  
>>  
>>  
>>  
>> On 2/20/19, ITACPRACoordinator <ITACPRACoordinator@lacity.org> wrote:  
  
>>> Mr.Kohlhaas,  
>>> For your new and revised request, we will provide you the count on the  
>>> new  
>>> search first within 2 days, your request is still active and is in  
>>> progress, so don't have to wait for additional 4 months. Please let me  
>>> know if you could revise the request.  
>>>  
>>> Thank You  
>>>  
>>> On Wed, Feb 20, 2019 at 9:00 AM BBFLA  
>>> <beatboxingfoollosangeles@gmail.com>  
>>> wrote:  
>>>  
>>> That would ordinarily make sense, but in this case even if I provide  
>>> search terms other than the email addresses the facts of this  
>>> particular case will not change, so that when you're using the facts  
>>> to determine the public interest, like you said you would, those facts  
>>> will determine a number that you're willing to process, like you said.  
>>> Since the fact will not change, the number will not change, so that
```

## **EXHIBIT B**

**Subject:** ITA request under Cal. Pub. Rec. Act

**From:** "C.R. Victor" <crvictorlaw@aol.com>

**Date:** 2/16/19, 12:28 PM

**To:** kuljeet.arora@lacity.org

Mr. Arora,

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**Subject:** Re: ITA request under Cal. Pub. Rec. Act

**From:** "C.R. Victor" <crvictorlaw@aol.com>

**Date:** 3/5/19, 6:54 AM

**To:** Kuljeet.arora@lacity.org

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From: C.R. Victor <crvictorlaw@aol.com>

To: kuljeet.arora <kuljeet.arora@lacity.org>

Sent: Sat, Feb 16, 2019 12:28 pm

Subject: ITA request under Cal. Pub. Rec. Act

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**Subject:** Re: ITA request under Cal. Pub. Rec. Act

**From:** Kuljeet Arora

**Date:** 3/5/19, 11:17 AM

**To:** "C.R. Victor" <[crvictorlaw@aol.com](mailto:crvictorlaw@aol.com)>

**CC:** Frank Cordero <[frank.cordero@lacity.org](mailto:frank.cordero@lacity.org)>, Strefan Fauble <[strefan.fauble@lacity.org](mailto:strefan.fauble@lacity.org)>

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Kuljeet Arora  
Sr. Systems Analyst II

Information Technology Agency\*  
200 N. Main St, CHE, 14th floor (14-171)  
Los Angeles, CA 90012

([213.922-8307](tel:213.922-8307) | \*: [Kuljeet.Arora@lacity.org](mailto:Kuljeet.Arora@lacity.org))

\* a department of 'City of Los Angeles'

'Please note that every other Monday is my Regular Day Off'

"Teaching and Learning Are Lifelong Journeys".

~ Author Unknown

P Please consider the environment before printing this email

Attachments:

Blank public records and ediscovery request form 112918.doc 35.5 kB

**Subject:** Re: ITA request under Cal. Pub. Rec. Act  
**From:** "C.R. Victor" <crvictorlaw@aol.com>  
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**CC:** frank.cordero@lacity.org, strefan.fauble@lacity.org

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Cc: Frank Cordero <frank.cordero@lacity.org>; Strefan Fauble <strefan.fauble@lacity.org>  
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**Subject:** Re: ITA request under Cal. Pub. Rec. Act

**From:** Kuljeet Arora

**Date:** 3/6/19, 10:59 AM

**To:** "C.R. Victor" <[crvictorlaw@aol.com](mailto:crvictorlaw@aol.com)>

**CC:** Frank Cordero <[frank.cordero@lacity.org](mailto:frank.cordero@lacity.org)>, Strefan Fauble <[strefan.fauble@lacity.org](mailto:strefan.fauble@lacity.org)>

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**CC:** frank.cordero@lacity.org, strefan.fauble@lacity.org

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Cc: Frank Cordero <frank.cordero@lacity.org>; Strefan Fauble <strefan.fauble@lacity.org>  
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**Subject:** Re: ITA request under Cal. Pub. Rec. Act

**From:** ITACPRACoordinator

**Date:** 3/7/19, 8:51 AM

**To:** "C.R. Victor" <[crvictorlaw@aol.com](mailto:crvictorlaw@aol.com)>

**CC:** Frank Cordero <[frank.cordero@lacity.org](mailto:frank.cordero@lacity.org)>, Strefan Fauble <[strefan.fauble@lacity.org](mailto:strefan.fauble@lacity.org)>, Maryam Abbassi <[maryam.abbassi@lacity.org](mailto:maryam.abbassi@lacity.org)>, Jeanne Holm <[jeanne.holm@lacity.org](mailto:jeanne.holm@lacity.org)>, Mike Dundas <[mike.dundas@lacity.org](mailto:mike.dundas@lacity.org)>

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**CC:** frank.cordero@lacity.org, strefan.fauble@lacity.org, maryam.abbassi@lacity.org, jeanne.holm@lacity.org, mike.dundas@lacity.org

Hello Mr. Arora,

1. Burdensome and staff time are not exemptions listed in the Cal. Pub. Rec. Act. Please either produce these records or else state an exemption and refuse to produce them so that we can move on.

2. For pre-2018 send me a list of the requests and I will contact the owners of the records directly for the post-redaction versions. For 2018 and on send me the Google links. Or as above refuse to produce, cite an exemption, and we will move on.

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To: C.R. Victor <crvictorlaw@aol.com>

Cc: Frank Cordero <frank.cordero@lacity.org>; Strefan Fauble <strefan.fauble@lacity.org>; Maryam Abbassi <maryam.abbassi@lacity.org>;

Jeanne Holm <jeanne.holm@lacity.org>; Mike Dundas <mike.dundas@lacity.org>

Sent: Thu, Mar 7, 2019 8:52 am

Subject: Re: ITA request under Cal. Pub. Rec. Act

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Sent: Wed, Mar 6, 2019 11:00 am

Subject: Re: ITA request under Cal. Pub. Rec. Act

## **EXHIBIT C**

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@the-hanged-man.net

**Date:** 2/19/16, 8:25 PM

**To:** "Agnes Lung-Tam" <agnes.lung-tam@lacity.org>

Dear Ms. Lung-Tam,

Thanks for your help. A filled-out form is attached. If it will be helpful I can provide a flash drive. Is it possible to wait to see how big the file is before buying it? Also, is there a charge for this service?

Thank you,

Adrian Riskin

On Thu, Feb 18, 2016, at 04:05 PM, Agnes Lung-Tam wrote:

Hi, Mr. Riskin,

Thank you for your patience! After resolving unforeseen technical difficulties during the migration, the Information Technology Agency (ITA), working with Google, has finally completed the migration from the old system which had technical difficulties with email searches. ITA has started resuming email searches by working in a chronological order, starting with the oldest group of CPRA search requests in our queue, since there is a large multi-months backlog of search requests.

Please let us know if you still need your search request to be completed. If yes, we would appreciate it if you can complete the attached Public Records and eDiscovery Request Form and return it to us. This completed form will provide the clarity needed by the staff person performing the email search for you. Thanks again for your patience and your cooperation!

**\*Agnes Lung-Tam\***

**\*Compliance Manager\***

**\*Information Technology Agency (ITA)\***

**\*City of Los Angeles \***

On Thu, Jan 21, 2016 at 4:13 PM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net) wrote:

Oh, excellent. Thanks so much.

Adrian

On Thu, Jan 21, 2016, at 04:13 PM, Agnes Lung-Tam wrote:

Hi, Mr. Riskin,

Since you had inquired about making a request, I had placed your name in

the queue even though you did not provide the specific search information at the time since we could not process it. We will contact you for the search information when we come to your name/request chronologically in the queue. Thanks.

On Thu, Jan 21, 2016 at 4:06 PM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net) wrote:

Dear Ms. Lung-Tam,

Did I make a request? I think I refrained from making one because you told me that it wasn't possible. Can I now make the request I would have made at that time?

Thanks again,

Adrian

On Thu, Jan 21, 2016, at 04:03 PM, Agnes Lung-Tam wrote:

Hi, Mr. Riskin,  
After resolving unforeseen technical difficulties, the migration has finally been completed and we are just resuming the email records

search

process, starting with the oldest chronologically CPRA and records

search

requests in the queue. We are trying to work through the large multi-months backlog and will be contacting you when we come to your request in the queue. Thanks so much for your patience!

**\*Agnes Lung-Tam\***

**\*Compliance Manager\***

**\*Information Technology Agency (ITA)\***

**\*City of Los Angeles \***

On Thu, Jan 21, 2016 at 11:25 AM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net) wrote:

Dear Ms. Lung-Tam,

I was wondering if the process of migration to the new email system is

complete yet and, subsequently, whether it is possible again to

make

public records act requests for older city emails?

Thanks for your help,

Adrian Riskin

On Tue, Sep 22, 2015, at 04:04 PM, Agnes Lung-Tam wrote:

Unfortunately I do not have an estimated completion date yet.

Thanks.

On Tue, Sep 22, 2015 at 4:55 PM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)

wrote:

OK, thanks. I agree that it's crucial to preserve this

stuff. Is

there

any idea when it might be available?

Thanks again,

Adrian

On Tue, Sep 22, 2015, at 04:48 PM, Agnes Lung-Tam wrote:

Hi, Mr. Riskin,

Thank you for your email. We regret to inform you that the

Information

Technology Agency (ITA) cannot process your request for email

search

at

this time. Because our email searches had been run through

an

old

database search tool which was at the end of its life cycle, the

system

was no

longer able to handle complex searches. Therefore, ITA has

temporarily

suspended all searches to migrate the existing data to a

new,

faster

search product that is being provided by Google. As a

result, at

this

time, the requested records are temporarily exempt under

Government

Code

section 6255. As to these records, Government Code section

6255

permits

this temporary delay because the public interest served by

providing

ITA

with the time needed to safely preserve and migrate the email

data

clearly  
outweighs the public interest served by records'

disclosure. We

thank

you  
for your patience and understanding as ITA goes through this

transition.

**\*Agnes Lung-Tam\***

**\*Compliance Manager\***

**\*Information Technology Agency (ITA)\***

**\*City of Los Angeles \***

On Tue, Sep 22, 2015 at 4:10 PM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)

wrote:

Dear Ms. Lung-Tam,

I'm contacting you at the suggestion of Todd Gaydowski to

ask

if I

should direct a public records request for emails from Eric

Garcetti's

term as council member for CD13. Please let me know if

this is

within

your remit and I'll send my specific request.

Thanks in advance,  
Adrian Riskin

Email had 1 attachment:

+ public records and ediscovery request form 021616 (2).docx  
23k  
(application/vnd.openxmlformats-officedocument.wordprocessingml.document)

—Attachments:

---

public records and ediscovery request form 021616-Riskin-2016\_02\_19.docx 11.9 kB

**ITA**  
**FOIA/eDiscovery Request Form**

1. **Department/Outside Entity Name:** Adrian Riskin

2. **Name of Case (if applicable):**

---

3. **Search Start Date (mm/dd/yyyy):** 01/01/2007

---

4. **Search End Date (mm/dd/yyyy):** 12/31/2016

---

5. **List all City Email Addresses or departments to Search (Indicate TO or FROM):** *add additional lines as appropriate*

\_\_\_\_\_ Council District 13 \_\_\_\_\_ (I can't find everyone's email addresses, but if necessary, here's a partial list: [Jane.Berner@lacity.org](mailto:Jane.Berner@lacity.org), [Sarah.Dusseault@lacity.org](mailto:Sarah.Dusseault@lacity.org), [Cecilia.Cabello@lacity.org](mailto:Cecilia.Cabello@lacity.org), [SAM.SIEGEL@LACITY.ORG](mailto:SAM.SIEGEL@LACITY.ORG), [Shane.Goldsmith@lacity.org](mailto:Shane.Goldsmith@lacity.org), [Mitch.Ofarrell@lacity.org](mailto:Mitch.Ofarrell@lacity.org), [Helen.Leung@lacity.org](mailto:Helen.Leung@lacity.org), [Heather.Repenning@lacity.org](mailto:Heather.Repenning@lacity.org), [eric.garcetti@lacity.org](mailto:eric.garcetti@lacity.org), [daniel.halden@lacity.org](mailto:daniel.halden@lacity.org))

\_\_\_\_\_ I would like emails both to and from anyone at CD13 in that time span if possible, if not possible then both to and from the listed addresses. \_\_\_\_\_

---

---

---

---

6. **List all external email addresses to search (indicate TO or FROM):** *add additional lines as appropriate*

\_\_\_\_\_ to.from anyone at hollywoodbid.org \_\_\_\_\_

---

---

---

7. List Search Terms: (A single term is a single word such as “test”. A phrase is a group of words surrounded by double quotes such as “this is test”. Multiple terms can be combined together with AND/OR to form a more complex query/search: *add additional lines as appropriate*

\_\_\_\_\_no search terms\_\_\_\_\_

**8. Court ordered/legal date, if applicable (mm/dd/yyyy):**

## 9. External drive provided to store the search results:

- a. YES \_\_\_\_\_
- b. NO (list email address to receive results): adrian@foutu.org
- c. Note that I will supply a flash drive on request if necessary\_\_\_\_\_

**NOTE: THE SYSTEM CAN ONLY PROVIDE SEARCH RESULTS IN MBOX FORMAT.**

**Subject:** Re: Possible archived emails from CD13  
**From:** Agnes Lung-Tam <agnes.lung-tam@lacity.org>  
**Date:** 2/22/16, 2:43 PM  
**To:** adrian@the-hanged-man.net  
**CC:** Wayne Chan <wayne.chan@lacity.org>

Hi, Mr. Riskin,  
Thanks for completing the form. Please be aware that ITA is working diligently through the backlog, so yours will be completed in the order received, which may take some time. We will notify you as to the size of the search results once your request is completed. Thanks.

On Fri, Feb 19, 2016 at 8:25 PM, <[adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)> wrote:

Dear Ms. Lung-Tam,

Thanks for your help. A filled-out form is attached. If it will be helpful I can provide a flash drive. Is it possible to wait to see how big the file is before buying it? Also, is there a charge for this service?

Thank you,

Adrian Riskin

On Thu, Feb 18, 2016, at 04:05 PM, Agnes Lung-Tam wrote:

> Hi, Mr. Riskin,  
>  
> Thank you for your patience! After resolving unforeseen technical  
> difficulties during the migration, the Information Technology Agency  
> (ITA),  
> working with Google, has finally completed the migration from the old  
> system which had technical difficulties with email searches. ITA has  
> started resuming email searches by working in a chronological order,  
> starting with the oldest group of CPRA search requests in our queue,  
> since  
> there is a large multi-months backlog of search requests.  
>  
>  
> Please let us know if you still need your search request to be completed.  
> If yes, we would appreciate it if you can complete the attached Public  
> Records and eDiscovery Request Form and return it to us. This completed  
> form will provide the clarity needed by the staff person performing the  
> email search for you. Thanks again for your patience and your  
> cooperation!  
>  
>  
>  
> \*Agnes Lung-Tam\*

**Subject:** Re: Possible archived emails from CD13  
**From:** Agnes Lung-Tam <agnes.lung-tam@lacity.org>  
**Date:** 4/5/16, 4:41 PM  
**To:** adrian@the-hanged-man.net  
**CC:** Kuljeet Arora <kuljeet.arora@lacity.org>, "Lilly L. Fong" <lilly.fong@lacity.org>

Hi, Mr. Riskin,

Please be advised that the records request coordination function has been transferred to Kuljeet Arora (primary) and Lilly Fong. ITA is still working diligently through the multi-months email search request backlog as a result of the migration. They have the attached completed form that you had sent and will follow up with you accordingly. There is no charge for the service if you provide the drive for the search results. Thanks!

On Mon, Feb 22, 2016 at 2:43 PM, Agnes Lung-Tam <[agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)> wrote:

Hi, Mr. Riskin,

Thanks for completing the form. Please be aware that ITA is working diligently through the backlog, so yours will be completed in the order received, which may take some time. We will notify you as to the size of the search results once your request is completed. Thanks.

On Fri, Feb 19, 2016 at 8:25 PM, <[adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)> wrote:

Dear Ms. Lung-Tam,

Thanks for your help. A filled-out form is attached. If it will be helpful I can provide a flash drive. Is it possible to wait to see how big the file is before buying it? Also, is there a charge for this service?

Thank you,

Adrian Riskin

On Thu, Feb 18, 2016, at 04:05 PM, Agnes Lung-Tam wrote:

> Hi, Mr. Riskin,  
>  
> Thank you for your patience! After resolving unforeseen technical  
> difficulties during the migration, the Information Technology Agency  
> (ITA),  
> working with Google, has finally completed the migration from the old  
> system which had technical difficulties with email searches. ITA has  
> started resuming email searches by working in a chronological order,  
> starting with the oldest group of CPRA search requests in our queue,  
> since  
> there is a large multi-months backlog of search requests.  
>  
>

**Subject:** Re: Possible archived emails from CD13  
**From:** adrian@the-hanged-man.net  
**Date:** 4/5/16, 5:04 PM  
**To:** "Agnes Lung-Tam" <agnes.lung-tam@lacity.org>  
**CC:** Kuljeet Arora <kuljeet.arora@lacity.org>, "Lilly L. Fong" <lilly.fong@lacity.org>

Dear Ms. Lung-Tam,

Thanks for the update and for all your help. I wish you the best in your future endeavors.

Adrian

On Tue, Apr 5, 2016, at 04:41 PM, Agnes Lung-Tam wrote:

Hi, Mr. Riskin,

Please be advised that the records request coordination function has been transferred to Kuljeet Arora (primary) and Lilly Fong. ITA is still working diligently through the multi-months email search request backlog as a result of the migration. They have the attached completed form that you had sent and will follow up with you accordingly. There is no charge for the service if you provide the drive for the search results. Thanks!

On Mon, Feb 22, 2016 at 2:43 PM, Agnes Lung-Tam <[agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)> wrote:

Hi, Mr. Riskin,

Thanks for completing the form. Please be aware that ITA is working diligently through the backlog, so yours will be completed in the order received, which may take some time. We will notify you as to the size of the search results once your request is completed. Thanks.

On Fri, Feb 19, 2016 at 8:25 PM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net) wrote:

Dear Ms. Lung-Tam,

Thanks for your help. A filled-out form is attached. If it will be helpful I can provide a flash drive. Is it possible to wait to see how big the file is before buying it? Also, is there a charge for this service?

Thank you,

Adrian Riskin

On Thu, Feb 18, 2016, at 04:05 PM, Agnes Lung-Tam wrote:

Hi, Mr. Riskin,

Thank you for your patience! After resolving unforeseen technical difficulties during the migration, the Information Technology Agency

**Subject:** Re: Possible archived emails from CD13

**From:** Kuljeet Arora <kuljeet.arora@lacity.org>

**Date:** 4/28/17, 10:46 AM

**To:** adrian@the-hanged-man.net

**CC:** Ysabel Jurado <ysabel.jurado@lacity.org>, Manav Kumar <manav.kumar@lacity.org>

Hello Mr. Riskin,

This email is related to a CPRA request as of 9/22/15 regarding Council District 13. In the request, you had mentioned that you can't find everyone's email addresses but provided us a partial list.

Please let us know if you are still interested in this request, if yes, please provide us the complete list of names or advise if ITA can proceed with the names you provided us in your request. Please see attached.

Thank You

On Tue, Apr 5, 2016 at 4:41 PM, Agnes Lung-Tam <[agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)> wrote:

Hi, Mr. Riskin,

Please be advised that the records request coordination function has been transferred to Kuljeet Arora (primary) and Lilly Fong. ITA is still working diligently through the multi-months email search request backlog as a result of the migration. They have the attached completed form that you had sent and will follow up with you accordingly. There is no charge for the service if you provide the drive for the search results. Thanks!

On Mon, Feb 22, 2016 at 2:43 PM, Agnes Lung-Tam <[agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)> wrote:

Hi, Mr. Riskin,

Thanks for completing the form. Please be aware that ITA is working diligently through the backlog, so yours will be completed in the order received, which may take some time. We will notify you as to the size of the search results once your request is completed. Thanks.

On Fri, Feb 19, 2016 at 8:25 PM, <[adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)> wrote:

Dear Ms. Lung-Tam,

Thanks for your help. A filled-out form is attached. If it will be helpful I can provide a flash drive. Is it possible to wait to see how big the file is before buying it? Also, is there a charge for this service?

Thank you,

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@the-hanged-man.net

**Date:** 4/28/17, 10:53 AM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

Hello Kuljeet!

I am still interested. Can you proceed with my original list of names but also add Eric Garcetti to it (if I didn't have him on there before)?

Also, is the backlog still 18+ months, or is it getting shorter by any chance?

Thank you so much!

Adrian

On Fri, Apr 28, 2017, at 10:46 AM, Kuljeet Arora wrote:

Hello Mr. Riskin,

This email is related to a CPRA request as of 9/22/15 regarding Council District 13. In the request, you had mentioned that you can't find everyone's email addresses but provided us a partial list.

Please let us know if you are still interested in this request, if yes, please provide us the complete list of names or advise if ITA can proceed with the names you provided us in your request. Please see attached.

Thank You

On Tue, Apr 5, 2016 at 4:41 PM, Agnes Lung-Tam

[agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)

wrote:

Hi, Mr. Riskin,

Please be advised that the records request coordination function has been transferred to Kuljeet Arora (primary) and Lilly Fong. ITA is still working diligently through the multi-months email search request backlog as a result of the migration. They have the attached completed form that you had sent and will follow up with you accordingly. There is no charge for the service if you provide the drive for the search results. Thanks!

On Mon, Feb 22, 2016 at 2:43 PM, Agnes Lung-Tam <[agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)

wrote:

Hi, Mr. Riskin,

Thanks for completing the form. Please be aware that ITA is working diligently through the backlog, so yours will be completed in the order received, which may take some time. We will notify you as to the size of the search results once your request is completed. Thanks.

On Fri, Feb 19, 2016 at 8:25 PM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net) wrote:

Dear Ms. Lung-Tam,

**Subject:** Re: Possible archived emails from CD13

**From:** Kuljeet Arora <kuljeet.arora@lacity.org>

**Date:** 4/28/17, 10:59 AM

**To:** adrian@the-hanged-man.net

Hello Mr. Riskin,

Thank you for your response.

I will add the name as you mentioned in your email.

We are working diligently on catching up on the list and working hard on moving the list faster.

Thank you

On Fri, Apr 28, 2017 at 10:53 AM, <[adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)> wrote:

Hello Kuljeet!

I am still interested. Can you proceed with my original list of names but also add Eric Garcetti to it (if I didn't have him on there before)?

Also, is the backlog still 18+ months, or is it getting shorter by any chance?

Thank you so much!

Adrian

On Fri, Apr 28, 2017, at 10:46 AM, Kuljeet Arora wrote:

> Hello Mr. Riskin,

> This email is related to a CPRA request as of 9/22/15 regarding Council  
> District 13. In the request, you had mentioned that you can't find  
> everyone's email addresses but provided us a partial list.

>

> Please let us know if you are still interested in this request, if yes,  
> please provide us the complete list of names or advise if ITA can proceed  
> with the names you provided us in your request. Please see attached.

> Thank You

>

> On Tue, Apr 5, 2016 at 4:41 PM, Agnes Lung-Tam

> <[agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)>

> wrote:

>

> > Hi, Mr. Riskin,

> >

> > Please be advised that the records request coordination function has been  
> > transferred to Kuljeet Arora (primary) and Lilly Fong. ITA is still

**Subject:** Re: Possible archived emails from CD13

**From:** Kuljeet Arora <[kuljeet.arora@lacity.org](mailto:kuljeet.arora@lacity.org)>

**Date:** 6/15/17, 9:43 AM

**To:** [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)

**CC:** Ysabel Jurado <[ysabel.jurado@lacity.org](mailto:ysabel.jurado@lacity.org)>, Manav Kumar <[manav.kumar@lacity.org](mailto:manav.kumar@lacity.org)>, Omar Gonzales <[omar.gonzales@lacity.org](mailto:omar.gonzales@lacity.org)>, Strefan Fauble <[strefan.fauble@lacity.org](mailto:strefan.fauble@lacity.org)>

Hello Mr. Risikin and Omar,

As per your CPRA request St. Date: 01/01/2007 with End Date: 12/31/2009, the request produced zero (0) search results for the time frame given. Most users did not bring their pro-2010 email into Google.

Please let me know if you have any questions.

Your request is now closed.

Regards

On Fri, Apr 28, 2017 at 10:46 AM, Kuljeet Arora <[kuljeet.arora@lacity.org](mailto:kuljeet.arora@lacity.org)> wrote:

Hello Mr. Riskin,

This email is related to a CPRA request as of 9/22/15 regarding Council District 13. In the request, you had mentioned that you can't find everyone's email addresses but provided us a partial list.

Please let us know if you are still interested in this request, if yes, please provide us the complete list of names or advise if ITA can proceed with the names you provided us in your request. Please see attached.

Thank You

On Tue, Apr 5, 2016 at 4:41 PM, Agnes Lung-Tam <[agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)> wrote:

Hi, Mr. Riskin,

Please be advised that the records request coordination function has been transferred to Kuljeet Arora (primary) and Lilly Fong. ITA is still working diligently through the multi-months email search request backlog as a result of the migration. They have the attached completed form that you had sent and will follow up with you accordingly. There is no charge for the service if you provide the drive for the search results. Thanks!

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@the-hanged-man.net

**Date:** 6/15/17, 9:47 AM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

**CC:** Ysabel Jurado <ysabel.jurado@lacity.org>, Manav Kumar <manav.kumar@lacity.org>, Omar Gonzales <omar.gonzales@lacity.org>, Strefan Fauble <strefan.fauble@lacity.org>

Hello Ms. Arora.

I suppose it would have been useful to know this 21 months ago when I made the request so that I could have adjusted the timeframe to take this hitherto unrevealed fact into account. Is this newly discovered information about it being the users' choice whether to preserve their email or has IT known it all along?

Can you tell me how long the current backlog is?

Thanks,

Adrian

On Thu, Jun 15, 2017, at 09:43 AM, Kuljeet Arora wrote:

Hello Mr. Riskin and Omar,

As per your CPRA request St. Date: 01/01/2007 with End Date: 12/31/2009, the request produced zero (0) search results for the time frame given.

Most

users did not bring their pro-2010 email into Google.

Please let me know if you have any questions.

Your request is now closed.

Regards

On Fri, Apr 28, 2017 at 10:46 AM, Kuljeet Arora

[kuljeet.arora@lacity.org](mailto:kuljeet.arora@lacity.org)

wrote:

Hello Mr. Riskin,

This email is related to a CPRA request as of 9/22/15 regarding Council District 13. In the request, you had mentioned that you can't find everyone's email addresses but provided us a partial list.

Please let us know if you are still interested in this request, if yes, please provide us the complete list of names or advise if ITA can proceed with the names you provided us in your request. Please see attached.

Thank You

On Tue, Apr 5, 2016 at 4:41 PM, Agnes Lung-Tam [agnes.lung-tam@lacity.org](mailto:agnes.lung-tam@lacity.org)

wrote:

Hi, Mr. Riskin,

Please be advised that the records request coordination function has been

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@mailingaddress.org

**Date:** 6/19/17, 5:13 PM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

Hi Ms. Arora,

I'm still confused about this request. When I originally asked Ms. Lung-Tam about the search she told me that the emails from that time span were being migrated into a new system. She did not say anything about them not existing.

Is it really true that the City of Los Angeles allowed all or most of its emails from 2010 and earlier to be erased based on whether or not users decided to preserve them? This seems impossible. It also seems incredible that users' email wasn't migrated automatically. E.g. how could they answer an email from the last day of the old email system using the new email system?

It also seems impossible that there would not be backups, e.g. on tape or some other medium, of older emails.

Please note that CPRA requires you all to help me frame my request so that it's effective. Explaining the ultimate fate of the City's pre-2010 email archive seems to fall into this kind of communication.

Thanks again for your help,

Adrian

On Thu, Jun 15, 2017, at 09:43 AM, Kuljeet Arora wrote:

Hello Mr. Riskin and Omar,

As per your CPRA request St. Date: 01/01/2007 with End Date: 12/31/2009, the request produced zero (0) search results for the time frame given.

Most

users did not bring their pro-2010 email into Google.

Please let me know if you have any questions.

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wrote:

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Please let us know if you are still interested in this request, if yes, please provide us the complete list of names or advise if ITA can proceed with the names you provided us in your request. Please see attached.

Thank You

**Subject:** Re: Possible archived emails from CD13

**From:** Kuljeet Arora <kuljeet.arora@lacity.org>

**Date:** 7/6/17, 2:58 PM

**To:** adrian@the-hanged-man.net

**CC:** Ysabel Jurado <ysabel.jurado@lacity.org>, Manav Kumar <manav.kumar@lacity.org>, Omar Gonzales <omar.gonzales@lacity.org>, Strefan Fauble <strefan.fauble@lacity.org>

Hello Mr. Adrian,

Please let me know if you would like to keep the same search with new dates or start a new search.

Thank You

Regards

On Thu, Jun 15, 2017 at 9:47 AM, <[adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)> wrote:

Hello Ms. Arora.

I suppose it would have been useful to know this 21 months ago when I made the request so that I could have adjusted the timeframe to take this hitherto unrevealed fact into account. Is this newly discovered information about it being the users' choice whether to preserve their email or has IT known it all along?

Can you tell me how long the current backlog is?

Thanks,

Adrian

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> As per your CPRA request St. Date: 01/01/2007 with End Date: 12/31/2009,  
> the request produced zero (0) search results for the time frame given.  
> Most  
> users did not bring their pro-2010 email into Google.  
>  
> Please let me know if you have any questions.  
>  
> Your request is now closed.  
>  
> Regards  
>

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@mailingaddress.org

**Date:** 7/6/17, 3:17 PM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

Hello Mr. Kuljeet.

Can you run a search for all emails between the lacity.org addresses and anyone at the domain hollywoodbid.org from January 1, 2007 through December 31, 2016 with no search terms. I am attaching

If this is not possible, can you tell me the allowable parameters for requested searches?

Also, can you please clarify whether or not the City has possession of the records I originally requested? Your previous response was unclear in that you said the search you ran turned up nothing but you didn't say that the City did not retain emails from 2009 and earlier. If this is the case can you please let me know? Can you tell me roughly what emails the City has copies of? This would assist me in reframing this request if necessary so that it produces results.

thanks,

Adrian

On Thu, Jul 6, 2017, at 02:58 PM, Kuljeet Arora wrote:

Hello Mr. Adrian,  
Please let me know if you would like to keep the same search with new dates  
or start a new search.

Thank You

Regards

On Thu, Jun 15, 2017 at 9:47 AM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net) wrote:

Hello Ms. Arora.

I suppose it would have been useful to know this 21 months ago when I made the request so that I could have adjusted the timeframe to take this hitherto unrevealed fact into account. Is this newly discovered information about it being the users' choice whether to preserve their email or has IT known it all along?

Can you tell me how long the current backlog is?

Thanks,

Adrian

On Thu, Jun 15, 2017, at 09:43 AM, Kuljeet Arora wrote:

Hello Mr. Risikin and Omar,  
As per your CPRA request St. Date: 01/01/2007 with End Date: 12/31/2009,

**Subject:** Re: Possible archived emails from CD13

**From:** Kuljeet Arora <kuljeet.arora@lacity.org>

**Date:** 7/17/17, 9:11 AM

**To:** adrian@mailingaddress.org

Hello Mr. Adrian,

ITA can run the new search as you mentioned. For the prior search, there are no responsive records in our possession. As a frame of reference, the city has emails from 2010 on. Please let me know.

Thank You

Regards

On Thu, Jul 6, 2017 at 3:17 PM, <[adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)> wrote:

Hello Mr. Kuljeet.

Can you run a search for all emails between the [lacity.org](http://lacity.org) addresses and anyone at the domain [hollywoodbid.org](http://hollywoodbid.org) from January 1, 2007 through December 31, 2016 with no search terms. I am attaching

If this is not possible, can you tell me the allowable parameters for requested searches?

Also, can you please clarify whether or not the City has possession of the records I originally requested? Your previous response was unclear in that you said the search you ran turned up nothing but you didn't say that the City did not retain emails from 2009 and earlier. If this is the case can you please let me know? Can you tell me roughly what emails the City has copies of? This would assist me in reframing this request if necessary so that it produces results.

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> Hello Mr. Adrian,

> Please let me know if you would like to keep the same search with new  
> dates

> or start a new search.

>

> Thank You

>

> Regards

>

>

> On Thu, Jun 15, 2017 at 9:47 AM, <[adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net)> wrote:

>

> > Hello Ms. Arora.

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@mailingaddress.org

**Date:** 7/17/17, 9:14 AM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

Hi, thanks for letting me know. How long has it been known that all emails from 2009 and earlier are missing? Is there some reason Ms. Lung-Tam didn't tell me this at the time I made the request? Does anyone know what happened to the earlier emails?

On Mon, Jul 17, 2017, at 09:11 AM, Kuljeet Arora wrote:

Hello Mr. Adrian,  
ITA can run the new search as you mentioned. For the prior search, there are no responsive records in our possession. As a frame of reference, the city has emails from 2010 on. Please let me know.  
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Hello Mr. Adrian,  
Please let me know if you would like to keep the same search with new dates  
or start a new search.

Thank You

Regards

On Thu, Jun 15, 2017 at 9:47 AM, [adrian@the-hanged-man.net](mailto:adrian@the-hanged-man.net) wrote:

**Subject:** Re: Possible archived emails from CD13

**From:** Kuljeet Arora <kuljeet.arora@lacity.org>

**Date:** 7/17/17, 1:13 PM

**To:** adrian@mailingaddress.org

Mr. Adrian,

They aren't 'missing', the emails earlier than 2009 and older were part of the prior legacy system that was decommissioned because of costs to maintain staff and on site servers.

Two years worth of emails were retained for a time period until the city was fully switched to the cloud based email system, in use now.

Every email that the city has in its possession is in the current Vault database.

Thank You

Regards

On Mon, Jul 17, 2017 at 9:14 AM, <[adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)> wrote:

Hi, thanks for letting me know. How long has it been known that all emails from 2009 and earlier are missing? Is there some reason Ms. Lung-Tam didn't tell me this at the time I made the request? Does anyone know what happened to the earlier emails?

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> the

> city has emails from 2010 on. Please let me know.

> Thank You

> Regards

>

> On Thu, Jul 6, 2017 at 3:17 PM, <[adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)> wrote:

>

> > Hello Mr. Kuljeet.

> >

> > Can you run a search for all emails between the [lacity.org](http://lacity.org) addresses and  
> > anyone at the domain [hollywoodbid.org](http://hollywoodbid.org) from January 1, 2007 through  
> > December 31, 2016 with no search terms. I am attaching

> >

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@mailingaddress.org

**Date:** 7/17/17, 1:30 PM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

Can it be true that someone at the City made a conscious decision to destroy all emails from 2009 and earlier? And the City Attorney said this was OK? Is there some kind of paperwork associated with this decision?

Do you know by when you'll be able to run the search?

Thanks again for all your help.

Adrian

On Mon, Jul 17, 2017, at 01:13 PM, Kuljeet Arora wrote:

Mr. Adrian,  
They aren't 'missing', the emails earlier than 2009 and older were part of  
the prior legacy system that was decommissioned because of costs to  
maintain staff and on site servers.

Two years worth of emails were retained for a time period until the city  
was fully switched to the cloud based email system, in use now.

Every email that the city has in its possession is in the current Vault  
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Hello Mr. Adrian,  
ITA can run the new search as you mentioned. For the prior search, there  
are no responsive records in our possession. As a frame of reference,  
the  
city has emails from 2010 on. Please let me know.

Thank You

Regards

On Thu, Jul 6, 2017 at 3:17 PM, [adrian@mailingaddress.org](mailto:adrian@mailingaddress.org) wrote:

Hello Mr. Kuljeet.

Can you run a search for all emails between the lacity.org addresses

**Subject:** Re: Possible archived emails from CD13

**From:** Kuljeet Arora <kuljeet.arora@lacity.org>

**Date:** 7/17/17, 2:18 PM

**To:** adrian@mailingaddress.org

Mr. Adrian,

In my previous emails, I am asking to let me know if you would like ITA to run the new request. Please acknowledge by responding to the email that you would like ITA to proceed with your new search.

I will let you know by when your search will be ready.

Thank You

On Mon, Jul 17, 2017 at 1:30 PM, <[adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)> wrote:

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Do you know by when you'll be able to run the search?

Thanks again for all your help.

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> They aren't 'missing', the emails earlier than 2009 and older were part  
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> the prior legacy system that was decommissioned because of costs to  
> maintain staff and on site servers.  
>  
> Two years worth of emails were retained for a time period until the city  
> was fully switched to the cloud based email system, in use now.  
>  
> Every email that the city has in its possession is in the current Vault  
> database.  
>  
> Thank You  
>  
> Regards  
>  
> On Mon, Jul 17, 2017 at 9:14 AM, <[adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)> wrote:  
>

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@mailingaddress.org

**Date:** 7/17/17, 2:24 PM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

I would like ITA to proceed with my new search, as I told you on July 6.

Given the amount of time involved, can you please make the ending date be June 30, 2017 instead? I'm attaching a modified form.

Adrian

On Mon, Jul 17, 2017, at 02:18 PM, Kuljeet Arora wrote:

Mr. Adrian,

In my previous emails, I am asking to let me know if you would like ITA to run the new request. Please acknowledge by responding to the email that \*you would like ITA to proceed with your new search. \*

I will let you know by when your search will be ready.

Thank You

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Adrian

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Two years worth of emails were retained for a time period until the city was fully switched to the cloud based email system, in use now.

Every email that the city has in its possession is in the current Vault database.

Thank You

Regards

On Mon, Jul 17, 2017 at 9:14 AM, [adrian@mailingaddress.org](mailto:adrian@mailingaddress.org) wrote:

**Subject:** Re: Possible archived emails from CD13

**From:** Kuljeet Arora <kuljeet.arora@lacity.org>

**Date:** 7/17/17, 2:26 PM

**To:** adrian@mailingaddress.org

Thank you.

I will submit your new form to the Google Search team and let you know as soon as it is ready.

On Mon, Jul 17, 2017 at 2:24 PM, <[adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)> wrote:

I would like ITA to proceed with my new search, as I told you on July 6.

Given the amount of time involved, can you please make the ending date be June 30, 2017 instead? I'm attaching a modified form.

Adrian

On Mon, Jul 17, 2017, at 02:18 PM, Kuljeet Arora wrote:

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> to

> run the new request. Please acknowledge by responding to the email that

> \*you

> would like ITA to proceed with your new search. \*

>

> I will let you know by when your search will be ready.

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> Thank You

>

> On Mon, Jul 17, 2017 at 1:30 PM, <[adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)> wrote:

>

> > Can it be true that someone at the City made a conscious decision to

> > destroy all emails from 2009 and earlier? And the City Attorney said

> > this was OK? Is there some kind of paperwork associated with this

> > decision?

> >

> > Do you know by when you'll be able to run the search?

> >

> > Thanks again for all your help.

> >

> > Adrian

> >

> > On Mon, Jul 17, 2017, at 01:13 PM, Kuljeet Arora wrote:

> > > Mr. Adrian,

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@mailingaddress.org

**Date:** 7/17/17, 2:28 PM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

Thanks. Do you have any idea how long the backlog is? Do you have any idea when my request from May 2016 might be ready?

On Mon, Jul 17, 2017, at 02:26 PM, Kuljeet Arora wrote:

Thank you.

I will submit your new form to the Google Search team and let you know as soon as it is ready.

On Mon, Jul 17, 2017 at 2:24 PM, [adrian@mailingaddress.org](mailto:adrian@mailingaddress.org) wrote:

I would like ITA to proceed with my new search, as I told you on July 6. Given the amount of time involved, can you please make the ending date be June 30, 2017 instead? I'm attaching a modified form.

Adrian

On Mon, Jul 17, 2017, at 02:18 PM, Kuljeet Arora wrote:

Mr. Adrian,  
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run the new request. Please acknowledge by responding to the email that  
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I will let you know by when your search will be ready.

Thank You

On Mon, Jul 17, 2017 at 1:30 PM, [adrian@mailingaddress.org](mailto:adrian@mailingaddress.org) wrote:

Can it be true that someone at the City made a conscious decision to destroy all emails from 2009 and earlier? And the City Attorney said this was OK? Is there some kind of paperwork associated with this decision?

Do you know by when you'll be able to run the search?

Thanks again for all your help.

Adrian

On Mon, Jul 17, 2017, at 01:13 PM, Kuljeet Arora wrote:

Mr. Adrian,  
They aren't 'missing', the emails earlier than 2009 and older were

part

**Subject:** Fwd: Re: Possible archived emails from CD13

**From:** adrian@123mail.org

**Date:** 1/20/19, 11:32 AM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

**CC:** Mike Dundas <mike.dundas@lacity.org>

Hi Ms. Arora,

I'm just wondering about the status of this. It is 18 months old at this point. I know from talking to people that ITA can fill these requests sometimes in four or five months, so it really seems as if you're ignoring this.

Thanks for your attention to this pressing matter!

Adrian

----- Original message -----

From: [adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)

To: Kuljeet Arora <[kuljeet.arora@lacity.org](mailto:kuljeet.arora@lacity.org)>

Subject: Re: Possible archived emails from CD13

Date: Mon, 17 Jul 2017 14:24:35 -0700

I would like ITA to proceed with my new search, as I told you on July 6. Given the amount of time involved, can you please make the ending date be June 30, 2017 instead? I'm attaching a modified form.

Adrian

On Mon, Jul 17, 2017, at 02:18 PM, Kuljeet Arora wrote:

Mr. Adrian,

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I will let you know by when your search will be ready.

Thank You

—Attachments:

public records and ediscovery request form 021616-Riskin-2017\_07\_17.docx

12.0 kB

**Subject:** Automatic E-Mail Reply Re: Fwd: Re: Possible archived emails from CD13  
**From:** "Kuljeet Arora" <kuljeet.arora@lacity.org>  
**Date:** 1/20/19, 11:32 AM  
**To:** adrian@123mail.org

I am out of the office, returning on Wednesday 23rd, 2019.

For IT Professional Contract requests, please contact Maryam Abbassi at 213-473-9797, or email at [Maryam.Abbassi@lacity.org](mailto:Maryam.Abbassi@lacity.org) in an emergency, or leave me a message, I will contact you upon my return.

For CPRA matters, please leave me a message, and I will contact you upon my return,

Please note that every other Monday is my Regular Day Off (RDO).

Thank you.

--

Kuljeet Arora  
Sr. Systems Analyst II  
Information Technology Agency\*  
200 N. Main St, CHE, 14th floor (14-171)  
Los Angeles, CA 90012  
([213.922-8307](tel:213.922-8307) | \*: [Kuljeet.Arora@lacity.org](mailto:Kuljeet.Arora@lacity.org))  
\* a department of 'City of Los Angeles'  
'Please note that every other Monday is my Regular Day Off'

"Teaching and Learning Are Lifelong Journeys".

~ Author Unknown

**P** Please consider the environment before printing this email

**Subject:** Re: Re: Possible archived emails from CD13  
**From:** Kuljeet Arora <kuljeet.arora@lacity.org>  
**Date:** 1/23/19, 9:36 AM  
**To:** adrian@123mail.org  
**CC:** Mike Dundas <mike.dundas@lacity.org>

Mr. Adrian,

This request was closed by ITA on 04/12/18 as the results were shared with Mike Dundas for review. Please contact Mike directly for the results.

Thank you

On Sun, Jan 20, 2019 at 11:32 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Hi Ms. Arora,

I'm just wondering about the status of this. It is 18 months old at this point. I know from talking to people that ITA can fill these requests sometimes in four or five months, so it really seems as if you're ignoring this.

Thanks for your attention to this pressing matter!

Adrian

----- Original message -----

From: [adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)  
To: Kuljeet Arora <[kuljeet.arora@lacity.org](mailto:kuljeet.arora@lacity.org)>  
Subject: Re: Possible archived emails from CD13  
Date: Mon, 17 Jul 2017 14:24:35 -0700

I would like ITA to proceed with my new search, as I told you on July 6. Given the amount of time involved, can you please make the ending date be June 30, 2017 instead? I'm attaching a modified form.

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> would like ITA to proceed with your new search. \*  
>  
> I will let you know by when your search will be ready.  
>

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@123mail.org

**Date:** 1/23/19, 9:40 AM

**To:** Kuljeet Arora <kuljeet.arora@lacity.org>

**CC:** Mike Dundas <mike.dundas@lacity.org>

Hi Mike,

I suppose that when you told me that all my requests were complete you were including this one?

Thanks!

Adrian

On Wed, Jan 23, 2019, at 9:36 AM, Kuljeet Arora wrote:

Mr. Adrian,

This request was closed by ITA on 04/12/18 as the results were shared with Mike Dundas for review. Please contact Mike directly for the results.

Thank you

On Sun, Jan 20, 2019 at 11:32 AM [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

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Thanks for your attention to this pressing matter!

Adrian

----- Original message -----

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To: Kuljeet Arora <kuljeet.arora@lacity.org>

Subject: Re: Possible archived emails from CD13

Date: Mon, 17 Jul 2017 14:24:35 -0700

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run the new request. Please acknowledge by responding to the email that \*you

would like ITA to proceed with your new search. \*

I will let you know by when your search will be ready.

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@123mail.org

**Date:** 1/31/19, 12:17 PM

**To:** Mike Dundas <mike.dundas@lacity.org>

Hello Mike,

I'm just wondering if you can give me an ETA on this 18 month old matter?

Thanks!

Adrian

On Wed, Jan 23, 2019, at 9:40 AM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

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Thanks for your attention to this pressing matter!

Adrian

----- Original message -----

From: [adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)

To: Kuljeet Arora <[kuljeet.arora@lacity.org](mailto:kuljeet.arora@lacity.org)>

Subject: Re: Possible archived emails from CD13

Date: Mon, 17 Jul 2017 14:24:35 -0700

I would like ITA to proceed with my new search, as I told you on July 6. Given the amount of time involved, can you please make the ending date be June 30, 2017 instead? I'm attaching a modified form.

Adrian

On Mon, Jul 17, 2017, at 02:18 PM, Kuljeet Arora wrote:

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@123mail.org

**Date:** 2/11/19, 10:05 AM

**To:** Mike Dundas <mike.dundas@lacity.org>

Dear Mike,

I'm just wondering if you have a corrected estimate as to when this might be ready?

Thanks,

Adrian

On Thu, Jan 31, 2019, at 12:17 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Hello Mike,

I'm just wondering if you can give me an ETA on this 18 month old matter?

Thanks!

Adrian

On Wed, Jan 23, 2019, at 9:40 AM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

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Thanks!

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Thanks for your attention to this pressing matter!

Adrian

----- Original message -----

From: [adrian@mailingaddress.org](mailto:adrian@mailingaddress.org)

To: Kuljeet Arora <[kuljeet.arora@lacity.org](mailto:kuljeet.arora@lacity.org)>

Subject: Re: Possible archived emails from CD13

**Subject:** Re: Possible archived emails from CD13

**From:** Mike Dundas <mike.dundas@lacity.org>

**Date:** 2/11/19, 10:58 AM

**To:** adrian@123mail.org

Mr. Riskin,

I am waiting on an update from the staff who took over CPRA for our office. I will follow up by the end of the week.

On Mon, Feb 11, 2019 at 10:05 AM <[adrian@123mail.org](mailto:adrian@123mail.org)> wrote:

Dear Mike,

I'm just wondering if you have a corrected estimate as to when this might be ready?

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> Thanks!

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> Adrian

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> > > Thank you

> > >

**Subject:** Re: Possible archived emails from CD13

**From:** adrian@123mail.org

**Date:** 3/1/19, 10:18 AM

**To:** "Mike Dundas" <mike.dundas@lacity.org>

Mr. Dundas,

Just wondering which week you meant.

thanks!

Adrian

On Mon, Feb 11, 2019, at 10:59 AM, Mike Dundas wrote:

Mr. Riskin,

I am waiting on an update from the staff who took over CPRA for our office. I will follow up by the end of the week.

On Mon, Feb 11, 2019 at 10:05 AM [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

Dear Mike,

I'm just wondering if you have a corrected estimate as to when this might be ready?

Thanks,

Adrian

On Thu, Jan 31, 2019, at 12:17 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> Hello Mike,

>

> I'm just wondering if you can give me an ETA on this 18 month old matter?

>

> Thanks!

>

> Adrian

>

> On Wed, Jan 23, 2019, at 9:40 AM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> > Hi Mike,

> >

> > I suppose that when you told me that all my requests were complete you  
> > were including this one?

> >

> > Thanks!

> >

> > Adrian

> >

> > On Wed, Jan 23, 2019, at 9:36 AM, Kuljeet Arora wrote:

> > > Mr. Adrian,

> > > This request was closed by ITA on 04/12/18 as the results were shared with  
> > > Mike Dundas for review. Please contact Mike directly for the results.

> > > Thank you

> > >

> > > On Sun, Jan 20, 2019 at 11:32 AM [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

> > >

> > > > Hi Ms. Arora,

## **EXHIBIT D**

Request Visibility: Unpublished

## &lt; Request #18-1977 &gt;

OPEN

Emails between deron.williams@lacity.org and andrew.westall@lacity.org from Jan. 12, 2012 through Dec. 31 2014 in mbox pls tx.

Received August 3, 2018 via web

Departments Information Technology Agency (ITA)

Requester beatboxingfoolosangeles@gmail.com

beatboxingfoolosangeles@gmail.com

## Documents

Public (none)

Requester (none)

## Staff

Point of Contact **Kuljeet Arora (ITA)**



## External Message

Requester + Staff

Still wondering about the status of this, thanks.

April 11, 2019, 8:01pm by the requester

## External Message

Requester + Staff

Wondering about the status of this, thanks.

February 10, 2019, 1:20pm by the requester

## External Message

Requester + Staff

ITA has completed your CPRA request and has forwarded the records to City Attorney office for the review. We will contact you if there are any questions. Thank you

December 21, 2018, 2:57pm by Kuljeet Arora (ITA) (Staff)

## Due Date Changed

Public

01/31/2019 (was 12/21/2018). ITA has completed your CPRA request and has forwarded the records to City Attorney office for the review. We will contact you if there are any questions.

Thank you

December 21, 2018, 2:57pm

## Due Date Changed

Public

12/21/2018 (was 11/30/2018). Google Team is still working on this request. A reminder was sent to the team to put a priority.

December 6, 2018, 8:43am

## Due Date Changed

Public

11/30/2018 (was 10/31/2018). ITA's Google Team is working on this request. The results will be then delivered to the City Attorney for review. Thank you

November 1, 2018, 9:30am

## Due Date Changed

Public

10/31/2018 (was 08/13/2018). Determination Letter provided to the requester.

August 9, 2018, 7:58am

## External Message

Requester + Staff

Hello beatboxingfoolosangeles@gmail.com,  
Thank you for submitting your above request under California Public Records Act (CPRA) request to Information Technology Agency (ITA) as of dated Friday, August 7th, 2018. This email confirms that ITA has received your request and working on gathering the information.

Per your request, to provide you with emails between deron.williams@lacity.org and andrew.westall@lacity.org from Jan 12, 2012, through December 31, 2014, in MBIX format. You have not indicated any keyword that you are looking for. ITA is working on gathering this information and will submit it to you as soon as the information is gathered and reviewed.

ITA has made its determination on your request as required by Government Code section 6253(c). To the extent that this office has non-exempt records responsive to this request, those records will be produced at the conclusion of our search. While most of the records are expected to be non-exempt, we do know that some of the records may be exempt from production. Some records may be exempt from production under California Government Code section 6254(k) because they are confidential attorney-client communications and/or protected attorney work product.

Additionally, some of the records may be exempt from release under Government Code section 6254(b) because they are "records about pending litigation." Finally, while unlikely, some requested records may be withheld under Government Code section 6255 because they would show the listed officials' deliberative process. As to these documents, Government Code section 6255 permits nondisclosure because the public interest served by protecting the official's decision-making process clearly outweighs the public interest served by the records' disclosure. Because the responsive emails must be extracted from an archival database, Government Code 6253.9(b) states that the requester shall bear the actual cost of producing a copy of the record, including the cost to construct a record, and the cost of programming and computer services necessary to extract a copy of the record whenever programming is required. We will email you in the coming weeks with the estimated labor cost once our IT staff can program your search. Please keep in mind that the California Public Records Act allows this department to receive payment in advance of the delivery of the records. As you know, we are processing CPRA searches in the order they are received.

At this time, we estimate that we will be able to produce the records to you by the end of October 2018 or around then.

Please feel free to contact me directly, should you have any questions or concerns.

Thank You for your cooperation

Regards

August 7, 2018, 1:54pm by Kuljeet Arora (ITA) (Staff)

## Department Assignment

Public

Information Technology (ITA)

August 3, 2018, 9:57am

## Request Opened

Public

Request received via web

August 3, 2018, 9:57am

**Subject:** [External Message Added] City of Los Angeles public records request #18-1977  
**From:** "publicrecords@lacity.org" <support@nextrequest.com>  
**Date:** 10/18/19, 9:35 AM  
**To:** beatboxingfoollosangeles@gmail.com

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

## City of Los Angeles Public Records

**Hi there**

A message was sent to you regarding record  
request #18-1977:

Your request in the still shows 'OPEN'. Please advise ITA if you  
have not received the results of your request and you are still  
interested in getting them.

Thank You

Sincerely

**[View Request 18-1977](#)**

<http://lacity.nextrequest.com/requests/18-1977>

Request Visibility:  Unpublished

## &lt; Request #18-1977 &gt;

 OPEN

Emails between deron.williams@lacity.org and andrew.westall@lacity.org from Jan. 12, 2012 through Dec. 31 2014 in mbox pls tx.

Received August 3, 2018 via web

Departments Information Technology Agency (ITA)

Requester beatboxingfoollosangeles@gmail.com  
 beatboxingfoollosangeles@gmail.com

## Documents

Public (none)  
(pending)  


Requester (none)

## Staff

Point of Contact Kuljeet Arora (ITA)

 External Message 

Requester + Staff

ITA completed the request and forwarded the results to the City Attorney office for review. ITA will follow up if the records are ready to be shared. Thank you for your patience.

October 18, 2019, 1:53pm by Kuljeet Arora (ITA), Sr. Systems Analyst II (Staff)

 External Message

Requester + Staff

I have not received the results, I am still interested in receiving them, and I am requesting an estimated date of production.

October 18, 2019, 1:45pm by the requester

 External Message

Requester + Staff

Your request is still showing 'OPEN'. Please advise ITA if you have not received the results of your request and you are still interested in getting them.

Thank You

Sincerely

October 18, 2019, 9:35am by Kuljeet Arora (ITA), Sr. Systems Analyst II (Staff)

 External Message

Requester + Staff

Still wondering about the status of this, thanks.

April 11, 2019, 8:01pm by the requester

 External Message

Requester + Staff

Wondering about the status of this, thanks.

February 10, 2019, 1:20pm by the requester

## **EXHIBIT E**

Company Name	PSG Number	Website	Mailing Address	PUC/TCP Number
Advanced Leopard Limousine Tours	PSG0004204	advancedleopardlimos.com	6541 Hollywood Blvd, #106 Hollywood, CA 90028	PUC # 4204
A List Limousine & Transportation Services	PSG0010984	<a href="http://www.alistlimo.com">www.alistlimo.com</a>	8705 Aviation Blvd. Los Angeles, CA 90301	TCP# 10984P
Architecture Tours LA	PSG0024735	www.architecturetoursla.com	P.O. Box 93134 Los Angeles, CA 90093	TCP# Unavailable
Amazing LA Race/LARF, Inc.	PSG 017325	amazinglarace.com	1171 So. Robertson Blvd Los Angeles, CA 90035	TCP# Unavailable
City Pass-Hollywood Walk of Fame	N/A	<a href="http://www.citypass.com">www.citypass.com</a>	1035 Barrow Lane Napa, CA 94558	N/A
Discover America Tours	PSG0024374	discoveramericatours.com	5500 Hollywood Blvd., #308 Hollywood, CA 90027	TCP# Unavailable

Phone Number	PUC Status per PUC Website	Insurance Policy	PL and PD Policy Number	PL and PD Insurance Company Address
(310) 858-0770	Name used for Search: Advanced Limousine, LTD Transportation Charter Party Class P Permit - Active	PL and PD Policy	LINS000010	NATIONAL SPECIALTY INSURANCE COMPANY 8200 ANDERSON BLVD FORT WORTH, TX 76120
(310) 568-1590	Name used for Search: A List Limousine Transportation Charter Party Class P Permit - Active - 08/14/2009	PL and PD Policy Workers Compensation Coverage	CAOL013780	NATIONAL CASUALTY CO 8877 NORTH GAINY CENTER DR SCOTTSDALE, AZ 85258
(323) 464-7868	Name used for Search: Architecture Tours LA Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy	LINS001820	NATIONAL SPECIALTY INSURANCE COMPANY 8200 ANDERSON BLVD FORT WORTH, TX 76120
(818) 942-3134	Name used for Search: Amazing LA Tours Inc Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy Workers Compensation Coverage	LFB0013251 Workers Compensation #: WD8331020808	RLI INSURANCE COMPANY 9025 N LINDBERGH DR PEORIA, IL 61615
(888)330-5008	N/A	N/A	N/A	N/A
(323) 467-7116	Name used for Search: Discover America Tours: Transportation Charter Class A Certificate - Denied - 03/30/2009	None Shown	None Shown	None Shown

Chamber Member	Notes
----------------	-------

Yes      Permit Appeared to be renewed when I ran search again on 9/24/2009

Yes

Yes

Yes      From their website  
it appears that the company  
uses all public transportation

Yes      tour Referral Service

Yes      Application Denied



E-Tours

PSG0022515

[www.ehollywoodtours.com](http://www.ehollywoodtours.com)

6760 Hollywood Blvd.  
Hollywood, CA 90028

TCP# 13720-S

Hollywood Movie Tours/Deadly Departed TcPSG0017747

5419 Hollywood Blvd., #C404  
[www.dearlydepartedtours.com](http://www.dearlydepartedtours.com)  
Hollywood, CA 90027

TCP# Unavailable

LA Active Adventures

PSG0022877

[laactiveadventures.com](http://laactiveadventures.com)

7018 Hollywood Blvd.  
Hollywood, CA 90028

TCP# 22877

LA Sightseeing Tours & Charters

PSG0013693

[lasightseeing.net](http://lasightseeing.net)

1434 2nd Street  
Santa Monica, CA 90401

TCP# Unavailable

LACITY Tours.com

PSG0008460

[lacitytours.com](http://lacitytours.com)

6806 Hollywood Blvd.  
Hollywood, CA 90028

TCP# 8460-S

(866) 398-8687 or (323) 336-5580	Name used for Search: Hollywood Sightseeing: Transportation Charter Class A Certificate - Denied - 12/31/2007	None Shown	None Shown	None Shown
(800) 789-9575 or (323) 466-3696	Name used for Search: Deadly Departed Tours: Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy	964401	CAROLINA CASUALTY INSR CO P O BOX 2575 JACKSONVILLE, FL 32203- 9986
(888) 800-7878 or (323) 422-1174	Name used for Search: LA Active Adventures: Transportation Charter Party Class P Permit - Active	PL and PD Policy	969704	CAROLINA CASUALTY INSR CO P O BOX 2575 JACKSONVILLE, FL 32203- 9986 PL and PD Policy: ZURICH AMERICAN INSURANCE COMPANY 1400 AMERICAN LANE SCHAUMBURG, IL 60196-1056
(800) 870-1886	Name use for Search: Los Angeles Sightseeing Tours: Transportation Charter Class B Certificate - Active Transportation Charter Party Sight- Seeing Permit - Active	Two Excess Policies Two PL and PD Policies Workers Compensation Coverage	UMB5765181 Excess Policy #: UMB5765181 UKFCL00100280 PL and PD Policy#: CP05765180 BUA4014152159 Workers Compensation#: 64500008892005	PL and PD Policy: CONTINENTAL CASUALTY CO 999 BAYHILL DRIVE SAN BRUNO, CA 94066 Workers Compensation: STATE COMPENSATION INSR FUND P O BOX 807 SAN FRANCISCO, CA 94102 PL and PD Policy: RLI INSURANCE COMPANY 9025 N LINDBERGH DR PEORIA, IL 61615 Two Workers Compensation Policies: 16686005 Workers Compensation#: 16686005 16686004 16686004
(323) 960-0300	Name used for Search: LA City Tours: Transportation Charter Class A Certificate - Active	PL and PD Policy	Two Workers Compensation Coverages	REPUBLIC INDEMNITY CO OF CALIF 15821 VENTURA BLVD ENCINO, CA 91436

Yes

Application Denied

Yes

Yes

Yes

Yes

Rock Star Tours Inc.	PSG0024984	rockstartoursla.com	6743 Hollywood Blvd. Hollywood, CA. 90028	TCP# 24984
Starline Tours and Tour Coach Charter	USA: PSG0013793 Hollywood: PSG0000227	<a href="http://www.starlinetours.com">www.starlinetours.com</a>	6541 Hollywood Blvd., Suite 110 Hollywood, CA. 90028	TCP# 227-S
Star City Tours	PSG0016056	lastarcitytours.com	6561 Hollywood Blvd. Hollywood, CA. 90028	TCP# Unavailable
Top Tours	PSG0019084	alloangelestours.com	7015 Hollywood Blvd. Hollywood, CA.	TCP#19084A
Hollywood Sightseeing Tours	PSG0022515	hollywoodtours.us	6750 Hollywood Blvd. Hollywood, CA. 90028	TCP# 13720S
Hot Rod Hollywood Tours	PSG0023770	streetrodtourshollywood.com	6658 Hollywood Blvd. Hollywood, CA. 90028	TCP# Unavailable

				SAN FRANCISCO, CA 94111 Workers Compensation: STATE COMPENSATION INSR FUND P O BOX 807 SAN FRANCISCO, CA 94102
(800) 701-7259 or (818) 632-9566	Name used for Search: Rockstar Tours Inc.: Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy Workers Compensation	CL951092 Workers Compensation#: 1938052	PL and PD Policy: RLI INSURANCE COMPANY 9025 N LINDBERGH DR PEORIA, IL 61615 Workers Compensation: ENDURANCE REINSURANCE CORPORATION OF AME 333 WESTCHESTER AVE WHITE PLAINS, NY 10604
(800) 959-3131	Name used for Search: Starline Tours USA: Transportation Charter Class A Certificate - Active Also have a Starline Tours Hollywood: Transportation Charter Class B Certificate - Active Transportation Charter Party Sight- Seeing Permit - Active	For USA: PL and PD Policy Workers Compensation	LFB0014151 Workers Compensation#: WEN001467101	DELOS INSURANCE COMPANY 120 WEST 45TH ST 36TH FLOOR NEW YORK, NY 10036 NEW YORK, NY 10003 Workers Compensation: STATE COMPENSATION INSR FUND P O BOX 807 SAN FRANCISCO, CA 94102
(323)462-1375 or (310) 228-8003	Name used for Search: Starcity Tours: Transportation Charter Party Sight- Seeing Permit - Active Transportation Charter Party Class P Permit - Revoked - 06/21/2004	PL and PD Policy	DEBP1034000	
(800) 270-5364	Name used for Search: Top Tour and Limo Inc.: Transportation Charter Class A Certificate - Active	PL and PD Policy Workers Compensation	P00340121801 Workers Compensation #: 1834467	
(323) 252-7873	Name used for Search: Hollywood Sightseeing Tours: Transportation Charter Class A Certificate - Denied - 12/31/2007	N/A	N/A	N/A
(323) 388-7449	Name used for Search: Street Rod Limos: Transportation Charter Party Sight- Seeing Permit - Active	PL and PD Policy	CL604556	EMPIRE FIRE AND MARINE INSR CO 450 SANSOME STREET SUITE 400 SAN FRANCISCO, CA 94111

Yes

Yes

No

No

No      Application Denied

No      Called and spoke with a gentleman who told  
me that the office is located at the address  
listed on PUC website

USA Tours (Red Line Tours LLC.)	Walking tour Company <a href="http://redlinetours.com">redlinetours.com</a>	6773 Hollywood Blvd Hollywood, CA.90028	N/A	
Amazing LA Tours Inc.	PSG0017325	<a href="http://amazinglatours.co">amazinglatours.co</a>	1423 2nd Street, Suite A Santa Monica, CA. 90401	
VIP Tours	PSG0013165	<a href="http://viptoursandcharters.com">viptoursandcharters.com</a>	9830 Bellanca Ave. Los Angeles, CA. 90045	
Hollywood Fun Tours	PSG0018560	No Website	515 Kelton Ave. Los Angeles, CA.90024	
California Tour Lines	PSG 08879	<a href="http://californiatourlines.com">californiatourlines.com</a>	No Address Available	TCP#8879S
Sunseekers Tours	PSG0019258	<a href="http://sunseekertours.com">sunseekertours.com</a>	109 E. Ocean Blvd. Long Beach, CA. 9080	TCP#1925

(323) 402-1074	N/A	N/A	N/A	N/A PEORIA, IL 61615 Workers Compensation: TOWER INSURANCE COMPANY OF NEW YORK 120 BROADWAY 14TH FLOOR NEW YORK, NY 10271
(877) 286-8752	Name used for Search: Amazing L A Tours Inc: Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy Workers Compensation	LFB0013251 Workers Compensation # : WD8331020808	BA162441 Worker's Compensation #: 17288703 LANCER INSR CO 370 WEST PARK AVE LONG BEACH, NY 11561
(800) 438-1814	Name used for Search: VIP Tours: Transportation Charter Class A Certificate - Active	PL and PD Policy Workers Compensation	PL and PD Policy Workers Compensation	CAROLINA CASUALTY INSR CO P O BOX 2575 JACKSONVILLE, FL 32203-9986
(310) 345-6482	Name used for Search: Hollywood Fun Tours: Transportation Charter Party Sight-Seeing Permit - Suspended - 07/31/2009 Transportation Charter Class B Certificate - Pending - 07/01/2009	PL and PD Policy	964185	PL and PD Policy Workers Compensation
(800) 989-7231 or (213) 249-0625	Name used for Search: California Tour Lines Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy	TP223175 Workers Compensation#: WSI002855901	NORTHLAND INSR CO 1295 NORTHLAND DR MENDOTA HEIGHTS, MN 55120 CAROLINA CASUALTY INSR CO P O BOX 2575 JACKSONVILLE, FL 32203-9986
(562) 331-1230	Name used for Search: Sunseeker Tours: Transportation Charter Party Sight-Seeing Permit - Active Transportation Charter Party Class P Permit - Active	PL and PD Policy Two Workers' Compensation Coverages	Workers' Compensation#: WEN000699003	

N/A From company's website: "Red Line Tours is LA's only daily operating walking tour company. We offer "edutainment" sightseeing tours of Hollywood and Downtown Los Angeles"

No

No

No Sightseeing Permit - Suspended  
Charter Class B Certificate - Pending

No

No

Gold Coast Tours	PSG 01133	goldcoasttours.us	105 Gemini Ave. Brea, CA. 92821	TCP#1133A
Showbiz Tours	PSG0015428	showbiztours.com	6922Hollywood Blvd. Hollywood, CA.90028	TCP#15428S
Hollywood Beverly Hills & Tours	PSG0014679	hollywoodexchangetours.com	6922 Hollywood Blvd. Hollywood, CA. 90028	TCP# Unavailable
LA Active Adventures	PSG0022877	laactiveadventures.com	5139 Clinton Street Los Angeles, CA. 90004	TCP#22877-P
Eagle Tours Bus Charter	PSG0021019	No Website	9550 Fair Drive, Suite #518 El Monte, CA. 91731	TCP# Unavailable
Hollywood Fantasy Tours	PSG0021120	No Website	6231 Hollywood Blvd Hollywood, CA. 90028	TSP# 22515A
Hollywood Land Tours	PSG0015419	No Website	1710 No. McCadden Place Hollywood, CA. 90028	TSP# 15419
Helicopter Tours	N/A	AdventurehelicopterTours.com	Whiteman Airport 12653 Osborne Street Pacoima, CA 91331	TCP# Unavailable

(800) 638-6427	Name used for Search: Gold Coast Tours: Website could not find, and company URL did not work either	N/A	N/A	N/A
(888) 908-3311	Name used for Search: found under "All Star Showbiz Tours - Not sure this is the same company: Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy	9623769986	CAROLINA CASUALTY INSR CO P O BOX 2575 JACKSONVILLE, FL 32203-
(323) 350-5168	Name used for Search: Hollywood Exchange and Tours: Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy Workers' Compensation	BAP9173907 Workers' Compensation#: 1870643	AMERICAN GUARANTEE AND LIABILITY INSR CO 1400 AMERICAN LANE SCHAUMBURG, IL 26247
(323) 422-1174	Name used for Search: LA Active Adventures: Transportation Charter Party Class P Permit - Active	PL and PD Policy	969704	CAROLINA CASUALTY INSR CO P O BOX 2575 JACKSONVILLE, FL 32203-9986
(626) 401-9933	Name used for Search: Eagle Tours LLC: Transportation Charter Class A Certificate - Active	PL and PD Policy Workers' Compensation	01CA0158473761 Workers' Compensation#: 6450000967	NEW HAMPSHIRE INSR CO 600 KING ST 7TH FLR STE #NHIS WILMINGTON, DE 19801
(323) 469-8184	Name used for Search: Hollywood Fantasy Tours: Transportation Charter Party Sight-Seeing Permit - Denied - 02/06/2007	N/A	N/A	N/A
(866) 707-5263	Name used for Search: Hollywood Land Tour: Transportation Charter Party Sight-Seeing Permit - Active	PL and PD Policy Workers' Compensation	LINS001989 Workers' Compensation#: 64510872007	NATIONAL SPECIALTY INSURANCE COMPANY 8200 ANDERSON BLVD FORT WORTH, TX 76120
(888) 933-5952	Name used for Search: Helicopter Tours: Not Found	N/A	N/A	N/A

Could not be found on site and personal URL did not work. However, goldcoasttours.com did work but it showed a charter bus company that matched the address given, this company may be operating under false precepts

No

Spoke with Shellee and she confirmed both companies All Start Showbiz Tours and Showbiz Tours are the same

No

No

No

No

No                   Sightseeing Permit - Denied

No

No                   Not Found on PUC Website

## **EXHIBIT F**

